

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

ENV-2024-CHC-37

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

**QUEENSTOWN LAKES
DISTRICT COUNCIL**

Appellant

AND

OTAGO REGIONAL COUNCIL

Respondent

RMA, S 274 NOTICE BY MERIDIAN ENERGY LIMITED

DATED 10 JUNE 2024

Instructing counsel:

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To The Registrar
Environment Court
Christchurch

I, **Meridian Energy Limited**, wish to be a party to the following proceeding:

- (a) The Environment Court appeal reference ENV-2024-CHC-37 concerning an appeal against Otago Regional Council decisions on the Proposed Otago Regional Policy Statement.

I am—

- (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.

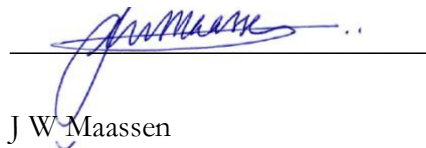
I am not a trade competitor for the purposes of [section 308C](#) or [308CA](#) of the Resource Management Act 1991.

I am 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.

I am interested in those parts of the proceeding identified in **Attachment 1** concerning the issues identified in Attachment 1, and I seek the relief in Attachment 1 and any ancillary relief to that identified in Attachment 1.

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 10 June 2024

Address for service of person wishing to be a party:
Telephone: 03 357 9767
Fax/email: Ellie.Taffs@meridianenergy.co.nz
Contact person: Eleanor Taffs, In-house counsel

ATTACHMENT 1: SPECIFIC PROVISIONS OF QUEENSTOWN LAKES DISTRICT COUNCIL APPEAL IN WHICH MERIDIAN HAS AN INTEREST

Provision in which Meridian has a s274 interest	Relief sought by the appellant	Meridian supports or opposes the appellant's relief sought	Reason for Meridian's support or opposition
<p>Interpretation NFL-O1 NFL-P3 EIT-INF-P13 Other provisions that address SMRM-I10</p>	<p>QLDC seeks the following relief:</p> <p>(a) Interpretation: reinstate the definition of HVNFL, as provided in the Notified Version of the pORPS;</p> <p>(b) NFL-O1: amend this objective to provide that if HVNFL are identified, they are maintained or enhanced;</p> <p>(c) NFL-P3: reinstate the Notified Version of NFL-P3;</p> <p>...</p> <p>(g) EIT-INF-P13: insert at limb (1) to avoid as a first priority, locating infrastructure, regionally significant infrastructure and nationally significant infrastructure in HVNFL or "rural areas of high amenity value", and managing the adverse effects on HVNFL by inserting at limb 2(a) "in highly valued natural features and landscapes, avoiding significant adverse effects and remedying or mitigating other adverse effects"; and / or</p> <p>(h) Any other amendment to provisions that addresses SMRM-I10 – Impact Snapshot – Social – "Damage to or loss of natural features and landscapes compromises amenity values."</p>	<p>Oppose</p>	<p>Meridian considers that the relief sought is not consistent with Part 2 of the RMA or the National Policy Statement for Renewable Electricity Generation 2011.</p> <p>Meridian also considers that where amendments to provisions are sought but not set out, the Appellant's relief is too vague to determine the implications for Meridian's interests.</p>