

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

ENV-2024-CHC-24

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

**AURORA ENERGY LIMITED,
NETWORK WAITAKI LIMITED
and POWERNET LIMITED**

Appellants

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

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

- (a) The Environment Court appeal reference ENV-2024-CHC-24 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.

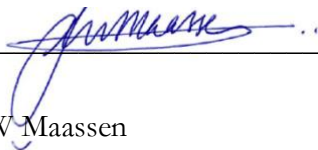
I am not a trade competitor for the purposes of [section 308C](#) or [308CA](#) of the Resource Management Act 1991.

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 7 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 AURORA ENERGY LIMITED, NETWORK WAITAKI LIMITED AND POWERNET LIMITED 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
CE-O5 – Activities in the Coastal Environment	<p>Amend CE-O5 as follows:</p> <p>CE-O5 – Activities in the coastal environment</p> <p>Activities in the coastal environment:</p> <ol style="list-style-type: none"> (1) make efficient use of space occupied in the coastal marine area, (2) are of a scale, density and design compatible with their location, (3) are only provided for within appropriate locations and limits acknowledging that some activities have a functional need <u>and operational need</u> to be located in the coastal environment, and (4) maintain or enhance public access to and along the coastal marine area, including for customary uses, such as mahika kai, except where public access needs to be restricted for reasons of health and safety or ecological or cultural sensitivity. 	Support	Meridian considers that the relief sought better gives effect to the National Policy Statement for Renewable Electricity Generation 2011 (NPSREG).
CE-P1 – Links with other chapters	<p>Amend CE-P1 such that the EIT Chapter applies to the coastal environment.</p> <p>CE-P1 – Links with other chapters</p> <ol style="list-style-type: none"> (1) the provisions of the ECO, EIT, and HAZ chapters apply within the coastal environment, except for the following provisions: <ol style="list-style-type: none"> (a) ECO-P3 to ECO-P6 and associated methods, (b) EIT-INF-P13 and associated methods, 	Oppose in part	Given that a number of appeals from other parties address EIT-INF-P13, the implications of the relief sought by the Appellant (in combination with other appeals on the same provision) on Meridian's interests is unclear.

	<p>(c) HAZ-NH-P1 to HAZ-NH- P4 and associated methods, and</p> <p>(2) the provisions within the following chapters of this RPS apply in addition to the provisions within this chapter:</p>		
ECO-P2, ECO-P3, ECO-P4, ECO-P5 and ECO-P6	Consequential relief to these policies to provide a carve out for effects to be addressed by proposed policy at [11] or as otherwise required to enable specified infrastructure as provided by the National Policy Statement on Indigenous Biodiversity 2023.	Oppose in part	The Appellant’s request for consequential relief to enable specified infrastructure (as provided by the National Policy Statement on Indigenous Biodiversity 2023) is too vague to determine the implications for Meridian’s interests.