

**MERIDIAN ENERGY LIMITED'S
SUBMISSION ON
HELIVENTURES NEW ZEALAND LIMITED'S
RESOURCE CONSENT APPLICATION RM240144**

To: Mackenzie District Council
53 Main Street, Fairlie 7925
planning@mackenzie.govt.nz

From: Meridian Energy Limited
PO Box 2146, Christchurch 8140
Attention: Nick Reuther
Mobile: 021 223 0096
Email: Nick.Reuther@MeridianEnergy.co.nz

This document sets out Meridian Energy Limited's submission on resource consent application RM240144 made by Heliventures New Zealand Limited (**the Applicant**) to Mackenzie District Council (**MDC**) for the establishment and operation of a helicopter aviation business and associated activities including visitor accommodation and functions/conferences at 15 and 17 Harry Wigley Drive, Pukaki (**the Site**).

Meridian confirms that 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, Meridian would consider presenting joint evidence at the time of the hearing.



Nick Reuther
For and on behalf of Meridian Energy Limited

Dated this 21st day of October 2025

STRUCTURE OF SUBMISSION

1. This submission is structured as follows:
Part One: About the submitter;
Part Two: Meridian's opposition to application RM240144;
Part Three: Relief sought.
2. All of Parts 1 to 3 (inclusive) of this submission are to be read together, and together they form Meridian's submission on resource consent application RM240144.

PART ONE: ABOUT THE SUBMITTER AND THE WAITAKI POWER SCHEME

3. Meridian is a limited liability company listed on the New Zealand Stock Exchange, with 51% of the company owned by the New Zealand Government. It is one of the three electricity generator companies formed from the split of the Electricity Corporation of New Zealand on the 1st of April 1999. 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. As well as being New Zealand's largest generator of electricity, Meridian is also the country's largest generator of renewable electricity.
4. Meridian has a significant interest in the Mackenzie District, with large parts of the nationally significant Waitaki Power Scheme (**WPS**) being in the district.
5. The WPS is existing major infrastructure. The operation, maintenance and upgrading of the WPS is a permitted activity in the Mackenzie District Plan (**MDP**). For these reasons, the WPS is very firmly part of the existing environment.
6. The WPS consists of eight power stations, four canal systems and numerous dams, weirs, gates and other control structures that operate as a linked hydroelectricity generation chain. The chain includes large, modified storage lakes, a series of diversions via canals, and a cascade of in-river dams.
7. Of the eight power stations, Meridian owns and operates six of these, from Lake Pūkaki to Lake Waitaki. The portion of the WPS that lies above Lake Ohau, the Ohau River and Lake Ruataniwha resides in the Mackenzie District.
8. The WPS was progressively constructed between 1928 and 1985. It contributes an average of 18% of New Zealand's annual electricity supply, and at times this can be as high as 30% of the national requirement. The WPS supports the HVDC link (which starts at the Benmore Power Station and connects the electricity networks of the North and South Islands) along with additional essential ancillary services.
9. The national significance of the WPS is recognised in the National Policy Statements for Renewable Electricity Generation 2011 (**NPS-REG**) and for Freshwater 2020 (**NPS-FM**).¹

¹ The WPS is one of only five hydro-electricity schemes in New Zealand that are listed in the NPS-FM (clause 3.31). The NPS-FM requires that, when implementing any part of the NPS-FM as it applies to a Freshwater Management Unit (FMU) or part of an FMU affected by a Scheme, a regional council must have regard to the importance of the Scheme's contribution to meeting New Zealand's greenhouse gas emission targets; contribution to maintaining the security of New Zealand's electricity supply; and generation capacity, storage, and operational flexibility.

PART TWO: MERIDIAN'S OPPOSITION TO APPLICATION RM240144

Overview

10. In brief, resource consent application RM240144 (which Meridian understands was lodged with MDC in September 2024) proposes the following development at the Site:
 - a) Establishment and operation of a helicopter aviation business and associated aviation activities; and
 - b) Provision of accommodation for approximately 22 people (staff and/or visitors) with an accommodation floor area of 548 square metres; and
 - c) Provision for conferences or functions between 8am and midnight, possibly seven days per week.
11. Meridian opposes the proposed activity in its entirety.
12. Meridian's opposition primarily stems from (though is not limited to) the following:
 - a) The proposed activity is located in the Pukaki Airport zone which is subject to the Hydro Inundation Hazard Overlay in the MDP;
 - b) The proposed activity increases the population at risk from hydro inundation, including unnecessarily increasing the population of non-aviation related occupants at the Pukaki Airport;
 - c) An increase in the population at risk in the Hydro Inundation Hazard Overlay at the Pukaki Airport will likely lead to additional regulatory requirements for the WPS and significant cost and operational implications for Meridian, including the potential for reduced generation capacity. That is, the proposed activity creates a reverse sensitivity effect by locating a new activity where it is at risk from an existing activity;
 - d) The proposed activity, and its reverse sensitivity effects, are in direct conflict with Policy D of the NPS-REG, and ATC-O4, ATC-O6, REG-O1, HI-O1 and HI-P1 of the MDP; and
 - e) The permitted activity rules in PC30 to the MDP authorise a significant increase in the population at risk at the Pukaki Airport and the Heliventures proposal further, and unnecessarily, adds to the potential population at risk.
13. For these reasons, Meridian seeks that resource consent application RM240144 be declined in its entirety
14. The following sections provide further context to Meridian's position.

The National Significance of Renewable Electricity Generation

15. In 2011, New Zealand recognised the vital role that renewable electricity generation plays in reducing greenhouse gas emissions, and the growing demand for renewable electricity generation in New Zealand. In response, the NPS-REG was Gazetted, with the objective of recognising *"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 that 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 target for renewable electricity generation"*.

16. In 2016 New Zealand ratified the Paris Agreement with the long-term goal of keeping the increase in the global average temperature to below 2°C above pre-industrial levels and to pursue efforts to limit the increase to 1.5°C. In 2019 New Zealand's Climate Change Response (Zero Carbon) Amendment Act 2019 was passed and set into law a domestic target of net zero emissions of long-lived greenhouse gases (other than biogenic methane) by 2050. In the same year, the Climate Change Commission was established to provide independent, evidence-based advice to the Government to help the transition to a climate-resilient and low emissions future. The previous government had the goal of 100% of electricity generated in New Zealand being from renewable resources by 2030. The current government has not proposed changes to this goal, rather they have committed to doubling renewable electricity generation by 2050 as a key component to achieving the 'net zero 2050' target. With this, the Government has committed to a range of regulatory changes to better enable the development of renewable electricity generation.²
17. The NPS-REG recognises "*The contribution of renewable electricity generation, regardless of scale, towards addressing the effects of climate change plays a vital role in the wellbeing of New Zealand, its people and the environment*". Consistent with this, Policy A of the NPS-REG recognises the national significance of "*maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions*".
18. Policy B requires that decision makers have particular regard to the following matters (amongst others):
 - a) Maintenance of the generation output of existing renewable electricity generation activities can require protection of the assets, operational capacity and continued availability of the renewable energy resource; and
 - b) Even minor reductions in the generation output of existing renewable electricity generation activities can cumulatively have significant adverse effects on national, regional and local renewable electricity generation output.
19. Policy C1 requires that decision makers have particular regard to the need to locate the renewable electricity generation activity where the renewable energy resource is available; the logistical or technical practicalities associated with developing, upgrading, operating or maintaining the renewable electricity generation activity; and the need to connect renewable electricity generation to the national grid (amongst other matters).
20. Key to achieving the objective and policies of the NPS-REG, Policy D requires that:

"Decision-makers shall, to the extent reasonably possible, manage activities to avoid reverse sensitivity effects on consented and on existing renewable electricity generation activities."
21. Meridian considers Policy D to be a clear direction to MDC that non-airport related activities should be prevented from establishing at Pukaki Airport due to the airport being in the Hydro Inundation Hazard Overlay and the resulting potential for reverse sensitivity effects on the WPS.

² At a glance: New Zealand's Energy Package, MBIE, October 2025, page 3.

Protection of the WPS in the Mackenzie District

22. As previously discussed, the WPS is existing major infrastructure and the MDP permits the operation, maintenance and upgrading of the WPS.
23. The significance of the WPS (as an existing renewable electricity generation activity) along with the need to protect the WPS from reverse sensitivity effects, is explicitly recognised in ATC-O4, ATC-O6, REG-O1, HI-O1 and HI-P1 of the MDP. These provisions read as follows, with underlining added for emphasis on the matter at hand.

ATC-O4 Renewable Electricity

"The local, regional and national benefits of the District's renewable electricity generation and electricity transmission activities and assets are recognised and their development, operation, maintenance and upgrade are provided for and reverse sensitivity effects on those activities and assets are avoided."

ATC-O6 Incompatible Activities

"The location and effects of activities are managed to:....protect important existing activities from reverse sensitivity effects."

REG-O1 General Output

"The output from renewable electricity generation activities in the District for national, regional and local use is increased to support achievement of the New Zealand Government's national target for renewable electricity generation."

HI-O1 Hydro Inundation Hazard

"Development in the Hydro Inundation Hazard Overlay minimises risks to human health and property from hydro inundation, and avoids reverse sensitivity effects on hydro electricity generation activities."³

HI-P1 Development in Hydro Inundation Hazard Areas

"Avoid, as far as practicable, changes to existing land use activities in the Hydro Inundation Hazard Overlay that may increase the likelihood or scale of harm to people or property from hydro inundation, or the potential for reverse sensitivity effects. Where it has been demonstrated that avoidance is not practicable, minimise the potential for harm."⁴

24. Pursuant to s104(1)(b)(vi) of the Resource Management Act 1991, MDC when making their decision on the Heliventures application must have regard to each of the preceding provisions. ATC-O4 and ATC-O6 are operative provisions, and plan change decisions have been made on REG-O1, HI-O1 and HI-P1 and no appeals apply to these provisions. In addition, the Hydro Inundation Hazard Overlay was inserted into the MDP via PC28. Decisions have been made on the Hydro Inundation Hazard Overlay and no appeals have been lodged on this overlay. Accordingly, these provisions and the Hydro Inundation Hazard Overlay must be provided substantial weight in MDC's decision on the Heliventures application.

³ Source: Decisions Version of PC28, HI-O1 is not subject to appeals.

⁴ Source: Decisions Version of PC28, HI-P1 is not subject to appeals.

25. As previously discussed, any increase in the population at risk at Pukaki Airport, including at 15 and 17 Harry Wigley Drive, will likely lead to additional regulatory requirements for the WPS. That is, the proposed activity creates a significant reverse sensitivity effect on the WPS and potential for reduced generation capacity. To grant a resource consent for an activity that results in such effects would be directly inconsistent with the preceding plan provisions.
26. Meridian notes that at the time the Heliventures resource consent application was lodged, strategic objective ATC-O4 was operative, and the hydro inundation maps were publicly available (see the following section of this submission). Despite this, the Heliventures application makes no reference to ATC-O4 or to the risks posed to people from the nature and scale of the proposed activity. While the application refers to ATC-O6, it only considers the potential reverse sensitivity effects on *“airport infrastructure”* (page 33 of the Applicant’s *“Assessment of Effects on the Environment”* (AEE)). Meridian considers this to be a substantive omission from the Heliventures AEE, and the application could be considered to be incomplete.

The Hydro Inundation Hazard Overlay

27. The Hydro Inundation Hazard Overlay was originally prepared between 2014 and 2016 and was first introduced into the MDP through the Section 293 (Resource Management Act 1991) process invoked by the Environment Court in 2011 on Plan Change 13 to the Mackenzie District Plan. While the hydro inundation map covered all hydro inundation areas, Plan Change 13 was limited to addressing activities in the Rural Zone, and for this reason the hydro inundation map that was adopted through the Plan Change 13 process only reflected the hydro inundation hazard in the Rural Zone. Plan Change 13 did not show the hydro inundation hazard at Pukaki Airport.
28. The recent Plan Change 28 to the MDP amended the planning maps to include Pukaki Airport in the Hydro Inundation Hazard Overlay. As previously discussed, decisions on PC28 adopt the proposed Hydro Inundation Hazard Overlay and there are no appeals on this overlay.
29. In the period between the Plan Change 13 process and notification of Plan Change 28, Meridian understands that the hydro inundation map that shows the full extent of hydro inundation hazard, including Pukaki Airport, was publicly available and that the hydro inundation risk has been addressed in MDC Land Information Memorandums.
30. Despite public availability of the hydro inundation hazard maps at the time that RM240144 was lodged with MDC, there is no reference to such hazards in the Heliventures resource consent application.

The Potential Reverse Sensitivity Effect

31. Large dams and canals, including those on the WPS, are primarily governed by the Building (Dam Safety) Regulations 2022, which are regulations made under the Building Act 2004. It is a legal requirement for dam owners to comply with these Regulations.
32. The New Zealand Dam Safety Guidelines, published by the New Zealand Society on Large Dams (NZSOLD), complement the Building (Dam Safety) Regulations 2022. While the regulations set the minimum legal requirements, the guidelines provide detailed industry-recommended practices for dam safety management and are referenced by Building Consent Authorities when considering applications for building consent to undertake work on Large Dams such as the WPS.

33. New developments constructed downstream of a dam or canal, and within a dam or canal breach flood inundation zone, can increase the potential consequences of a dam or canal breach, and in turn can lead to more onerous design, inspection and maintenance requirements, even though the dam or canal itself has not changed.
34. For example, an increase in the population at risk at Pukaki Airport could lead to requirements for more rigorous monitoring and surveillance, dam safety reviews, inspections, maintenance, testing of appurtenant structures and gates and valves, and preparation of emergency action plans and systems for identifying and managing dam safety issues. It is also possible that an increase in the population at risk may lead to the dams and canals needing to be strengthened to withstand greater structural loading conditions (primarily floods and earthquakes) which would involve significant works and significant periods when the generation of hydroelectricity would not be possible.

What is Reasonable Development at Pukaki Airport?

35. As previously discussed, Policy D of the NPS-REG, and ATC-O4, ATC-O6, HI-O1 and HI-P1, require that activities are managed to avoid reverse sensitivity effects on consented and existing renewable electricity generation activities.
36. Meridian accepts, within reason, the need to locate airport activities and airport support activities at Pukaki Airport. However, the proposed activity goes substantively beyond airport activities by including accommodation for approximately 22 people and provision for conferences/functions between 8am and midnight, possibly seven days per week, with no indication of the number of people that may attend such conferences/functions.
37. Meridian notes that the decisions version of Plan Change 30 (which is currently under appeal by both Heliventures and Meridian) permits significant aviation related development at Pukaki Airport. The permitted rules alone have the potential to substantially increase the population at risk within the Hydro Inundation Hazard Overlay and generate reverse sensitivity effects on the WPS. Any additional activities that are not airport or airport support activities are not appropriate at Pukaki Airport.

Non-Complying Activity

38. Rule 3.5.1 in Section 9 of the operative MDP states that within the Airport Zone “*any activity, which is not provided for as a Permitted, Controlled or Discretionary Activity in the Airport Zone*” is a non-complying activity. The nature and scale of the proposed activity is not provided for as a permitted, controlled or discretionary activity in the operative MDP, and this leads the proposed activity to be a non-complying activity. For the reasons set out in this submission, Meridian considers that the resource consent application for the proposed non-complying activity should be declined in its entirety.

PART THREE: RELIEF SOUGHT

39. Meridian seeks that resource consent application RM240144 be declined in its entirety.