

**IN THE ENVIRONMENT COURT OF NEW ZEALAND
CHRISTCHURCH REGISTRY**

**I MUA I TE KŌTI TAIAO O AOTEAROA
TE WHANGANUI-Ā-TARA ROHE**

ENV-2024-CHC-091

IN THE MATTER

of the Resource Management Act 1991 (“the Act”)

AND

IN THE MATTER

of an appeal under clause 14 Schedule 1 of the Act concerning Plan Changes 23 and 26 of the Mackenzie District Plan

BETWEEN

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

Appellant

AND

MACKENZIE DISTRICT COUNCIL

Respondent

NOTICE OF MERIDIAN ENERGY LIMITED’S WISH TO BE PARTY TO PROCEEDINGS

DATED 27 SEPTEMBER 2024



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**NOTICE OF MERIDIAN ENERGY LIMITED'S WISH TO BE PARTY TO
PROCEEDINGS**

To: The Registrar
Environment Court
Christchurch

1. **MERIDIAN ENERGY LIMITED** ("Meridian"), wishes to be a party to the following proceedings:

*The Royal Forest and Bird Protection Society of New Zealand Incorporated
v Mackenzie District Council ENV-2024-CHC-000091*

2. Meridian made a submission and a further submission about the subject matter of the proceedings and has an interest in the proceedings that is greater than the interest that the general public has as a renewable energy generator and provider with interests in the Mackenzie.
3. Meridian is not a trade competitor for the purposes of section 308C of the Resource Management Act 1991 (the RMA).
4. Meridian is interested in part of the proceedings being:
- Table 1 "PC23 - Part of decision appealed, reasons for appeal and relief sought" being Matter 8, GRUZ-O2 Zone Character and Amenity Values; and
 - Table 2 "PC26 - Part of Decision Appealed, Reasons for Appeal and Relief Sought" being all matters within the table.
5. 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.

6. Meridian is particularly interested in the relief the Appellant has sought which will either conflict or frustrate the directions set out in:

- (a) in RMA Part 2, including RMA, ss 7(i) and (j) as it relates to renewable energy generation and transmission;
- (b) the statutory requirement to give effect to the National Policy Statement Renewable Electricity Generation 2011 ("NPS - REG");
- (c) the Canterbury Regional Policy Statement 2013 ("CRPS");
- (d) the appropriate recognition of the importance of addressing the adverse effects of climate change;
- (e) the need to facilitate renewable energy generation to achieve targets set in the Climate Change Response Act 2002; and
- (f) the relief sought by Meridian in its appeal.

7. Meridian opposes the relief sought, including for the following reasons:

- (a) It fails to give effect to the NPS-REG;
- (b) It fails to give effect to the CRPS;
- (c) It is contrary to Part 2 and the purpose of the RMA, which is to promote the sustainable management of natural and physical resources;
- (d) It fails to recognise and provide for renewable electricity generation, decarbonisation, and addressing the adverse effects of climate change;
- (e) That the relief sought is inappropriate and insufficient to meet the reasonably foreseeable of renewable electricity generation activities in the Mackenzie;
- (f) It is inappropriate, unreasonable, unnecessary, and contrary to the overall purpose and provisions of the RMA;
- (g) It disregards the effects of climate change and the need to facilitate renewable energy to achieve the targets set in the Climate Change Response Act 2002;

- (h) The requested amendments are inconsistent with the relief sought by Meridian in its original submissions and appeal;
- (i) It will undermine the Decisions Version of the Plan, which, subject to Meridian's appeal is necessary to appropriately achieve RMA, Part 5; and
- (j) The Decision Version better tailors the needs of renewable electricity generation activities and effects (except, where those matters appealed by Meridian).

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

Date: 27 September 2024

Signature:



H J Tapper

On behalf of Meridian Energy Limited