

**SUBMISSION ON  
PROPOSED PLAN CHANGES 28, 29 and 30  
TO THE MACKENZIE DISTRICT PLAN  
UNDER THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991**

**To:** Plan Changes 28, 29 and 30 to the Mackenzie District Plan  
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Meridian Energy Limited (**Meridian**) makes the general and specific submissions on Proposed Plan Changes 28, 29 and 30 to the Mackenzie District Plan (hereafter referred to as **PC28, PC29** and **PC30**) that are set out in the attached document.

Meridian confirms that its submissions do not relate to trade competition or the effects of trade competition.

Meridian would like to be heard in support of its submissions.

If other persons make a similar submission, then Meridian would consider presenting joint evidence at the time of the hearing.



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Andrew Feierabend  
For and on behalf of Meridian Energy Limited

Dated this 22nd day of January 2025

## **STRUCTURE OF SUBMISSION**

1. This submission is structured as follows:  
Part One: About the submitter;  
Part Two: Context for Meridian's submissions; and  
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 submissions on PC28, PC29, and PC30.

## **PART ONE: ABOUT THE SUBMITTER**

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 companies formed from the split of the Electricity Corporation of New Zealand on the 1<sup>st</sup> 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 Plan, with large parts of the nationally significant Waitaki Power Scheme (hereafter referred to as the **WPS** or **the Scheme**) being located in the district.
5. The Scheme 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.
6. Of the eight power stations, Meridian owns and operates six of these, from Lake Pūkaki to Lake Waitaki. The portion of the Scheme that lies above Lake Ohau, the Ohau River and Lake Ruataniwha resides in the Mackenzie District.
7. The scheme 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 scheme 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.
8. The national significance of the WPS is established in the National Policy Statements for Renewable Electricity Generation 2011 (**NPS-REG**) and for Freshwater 2020 (**NPS-FM**).

## **PART TWO: CONTEXT FOR MERIDIAN'S SUBMISSIONS**

9. Meridian has previously advised Mackenzie District Council on the energy related provisions in recent plan changes. Meridian considers that such provisions need to fully reflect the importance of renewable electricity generation in New Zealand and the need to protect the existing WPS.
10. 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”.

11. 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.<sup>1</sup>
12. Section 75(3) of the Resource Management Act 1991 (**the Act**) requires that all district plans must give effect to a national policy statement. Accordingly, PC28, PC29 and PC30 must give effect to the NPS-REG (amongst other national policy statements).
13. As discussed previously, the objective of the NPS-REG is to recognise 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, so that the proportion of New Zealand’s electricity generated from renewable energy sources increases to meet or exceed the New Zealand Government’s national target for the same.
14. The preamble of 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” and Policy 4 of the NPS-FM requires that “Freshwater is managed as part of New Zealand’s integrated response to climate change”.
15. Accordingly, to give effect to the NPS-REG, plan changes PC28, PC29 and PC30 must provide for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities. At the same time, decision makers must have particular regard to protecting the assets and operational capacity of existing renewable electricity generation activities and to the need for significant development of new renewable electricity generation activities.
16. The NPS-REG also 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,

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<sup>1</sup> Our journey towards net zero, New Zealand’s second emissions reduction plan 2026-30, Tā Aotearoa mahere whakaheke tukunga tuarua, December 2024, page 37

- operating or maintaining the renewable electricity generation activity; and the need to connect renewable electricity generation to the national grid (amongst other matters).
17. Policy C2 of the NPS-REG requires that when decision makers are considering any residual effects of renewable electricity generation activities that cannot be avoided, remedied or mitigated, they must have regard to offsetting measures or environmental compensation, including measures or compensation that benefit the local environment and community affected.
  18. In addition to the NPS-REG, sections 7(i) and 7(j) of the Act expressly require that all persons exercising functions and powers under the Act, in relation to managing the use, development, and protection of natural and physical resources, have particular regard to the effects of climate change and the benefits to be derived from the use and development of renewable energy.
  19. The vital role that renewable electricity generation plays in combating climate change is also reflected in the National Policy Statement for Indigenous Biodiversity (**NPS-IB**) which explicitly excludes the development, operation, maintenance or upgrade of renewable electricity generation assets and activities from the application of the NPS-IB (clause 1.3(3) of the NPS-IB).
  20. PC28, PC29 and PC30 go some way towards meeting the requirements of the NPS-REG and sections 7(i) and 7(j) of the Act, however Meridian considers that they do not go far enough. In particular, Meridian considers that the following changes to PC28, PC29 and PC30 are needed:
    - a) Stronger prevention of new activities resulting in reverse sensitivity effects against existing renewable electricity generation activities;
    - b) Greater provision for subdivision, use and development of land for critical infrastructure needs, including consideration of the positive effects resulting from such activities;
    - c) Greater recognition of and provision for the functional needs and operational needs of renewable electricity generation activities; and
    - d) Stronger provisions to address the risks posed by the Pukaki Airport being within the Hydro Inundation Hazard Overlay.

### **PART THREE: RELIEF SOUGHT**

21. Based on the preceding context, Appendices 1, 2 and 3 of this submission set out Meridian's support for or opposition to specific provisions in PC28, PC29 and PC30, and the relief sought. With this, Meridian accepts that consequential amendments to these plan changes and other parts of the Mackenzie District Plan may be needed to give full effect to their submissions and seeks that such amendments are made where necessary.

## APPENDIX 1

### PC28 – Hazards and Risks, Historic Heritage, Notable Trees and Variation 1 to PC26 and Variation 1 to PC27

PC28 Provision	Support or Oppose	Reasons	Relief Sought
<b>Definition – critical infrastructure (in relation to Natural Hazards Chapter only)</b>	Oppose in part	<p>The proposed new definition reads:</p> <p><i>Those necessary facilities, services, and installations which are critical or of significance to either New Zealand, Canterbury, or Mackenzie, which if interrupted, would require immediate reinstatement. Critical infrastructure includes:</i></p> <ul style="list-style-type: none"> <li><i>a. Strategic transport network</i></li> <li><i>b. Telecommunication and radio communications networks</i></li> <li><i>c. National, regional and local electricity generation activities</i></li> <li><i>d. The National Grid and electricity distribution networks including emergency electricity supply facilities</i></li> <li><i>e. Public and community wastewater collection, treatment and disposal networks</i></li> <li><i>f. Public and community land drainage infrastructure</i></li> <li><i>g. Public and community stormwater infrastructure</i></li> <li><i>h. Public and community potable water and fire fighting supply systems</i></li> </ul>	<p>Amend the definition of <i>critical infrastructure (in relation to Natural Hazards Chapter only)</i> as follows:</p> <p><b><i>critical infrastructure <del>(in relation to Natural Hazards Chapter only)</del></i></b></p> <p><i><u>Infrastructure that is necessary to provide These necessary facilities, services, and installations which are critical or of significance to either New Zealand, Canterbury, or Mackenzie, which if interrupted, would have a significant effect on communities within the Mackenzie District, Canterbury region or wider populations and which would require immediate reinstatement. This includes any structures that support, protect or form part of critical infrastructure. Critical infrastructure includes.....</u></i></p>

		<ul style="list-style-type: none"> <li><i>i. Public and community-scale irrigation and stockwater infrastructure</i></li> <li><i>j. Gas storage and distribution infrastructure</i></li> <li><i>k. Bulk fuel supply infrastructure including terminals, and pipelines</i></li> <li><i>l. New Zealand Defence Force facilities</i></li> <li><i>m. Emergency Services facilities</i></li> <li><i>n. Healthcare facilities</i></li> <li><i>o. Airports.</i></li> </ul> <p>Meridian considers that the definition comprehensively identifies infrastructure types that are critical to ensuring the resilience of communities to the effects of natural hazard events and is therefore consistent with references to <i>critical infrastructure</i> in the Canterbury Regional Policy Statement.</p> <p>At the same time, Meridian considers that clarity of the chapeau to the list could be improved by more closely adopting the Canterbury Regional Policy Statement's definition for the same term, in particular by specifically stating that the definition includes <i>any structures that support, protect or form part of critical infrastructure</i>.</p> <p>Further to this, use of the term <i>critical infrastructure</i> is only used in the NH chapter of the notified version of PC28 meaning, it is not necessary to include "<i>(in relation to Natural Hazards Chapter only)</i>" in the term being defined. In addition, Meridian's submissions on other parts of PC28, PC29 and PC30 consider the term <i>critical infrastructure</i> and its proposed definition is useful in</p>	
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		some provisions beyond those address NH matters. This further supports	
<b>HAZS-O1</b> <b>Use and storage of hazardous substances</b>	Oppose in part	<p>HAZS-O1 reads:</p> <p><i>The benefits of the use and storage of hazardous substances are recognised while protecting human health and the environment from risks associated with these activities.</i></p> <p>This objective is too broad. Not all risks need to be eliminated to ensure the health and safety of people and the environment.</p> <p>Meridian seeks insertion of “by minimising”, where minimising is understood to mean ‘to reduce to the smallest amount reasonably practicable’. Insertion of these words allows for consideration of both the cost of reducing risk and the associated benefits to be gained from the reduction in risk.</p>	<p>Amend HAZS-O1 as follows:</p> <p><i>The benefits of the use and storage of hazardous substances are recognised while protecting human health and the environment <del>from</del> <u>by minimising</u> risks associated with these activities.</i></p>
<b>HAZS-O2</b> <b>Sensitive activities</b>	Oppose in part	<p>HAZS-O2 aims to both protect existing major hazard facilities from the reverse sensitivity effects that can result from new sensitive activities locating close to the former and protect existing sensitive activities from new major hazard facilities.</p> <p>Regarding protection of existing sensitive activities from new major hazard facilities, this is generally addressed in HASZ-O1.</p> <p>Meridian considers that HAZS-O2 should focus on protecting existing major hazard facilities from the reverse sensitivity effects that can result from new sensitive activities locating close to the former.</p>	<p>Amend HAZS-O2 as follows:</p> <p><b><u>HASZ-O2 Reverse Sensitivity Effects Sensitive Activities</u></b></p> <p><i>Reverse sensitivity effects of sensitive activities on existing major hazard facilities are <del>managed, and unacceptable risks to the sensitive activity are</del> avoided.</i></p>

<p><b>HAZS-P3</b></p> <p><b>Location of sensitive activities</b></p>	<p>Oppose in part</p>	<p>HAZS-P3 aims to both protect existing major hazard facilities from the reverse sensitivity effects that can result from new sensitive activities locating close to the former and protect existing sensitive activities from new major hazard facilities.</p> <p>Regarding protection of existing sensitive activities from new major hazard facilities, this is addressed in HAZS-P2.</p> <p>Meridian considers that HAZS-P3 should focus on protecting existing major hazard facilities from the reverse sensitivity effects that can result from new sensitive activities locating close to the former.</p>	<p>Amend HAZS-P3 as follows:</p> <p><i>Ensure any new sensitive activity is separated from any existing major hazard facility to <del>minimise</del> <u>avoid</u> the potential for reverse sensitivity effects on the major hazard facility, <del>and avoid unacceptable risk to the sensitive activity.</del></i></p>
<p><b>HAZS-R3</b></p> <p><b>Sensitive activities on a site adjoining a major hazard facility in all zones</b></p>	<p>Oppose</p>	<p>HAZS-R3 reads</p> <p><b><i>Sensitive Activities on a Site Adjoining a Major Hazard Facility</i></b></p> <p><b><i>All Zones</i></b></p> <p><b><i>Activity Status: RDIS</i></b></p> <p><b><i>Matters of discretion are restricted to:</i></b></p> <ol style="list-style-type: none"> <li><i>The risks associated with locating in proximity to the major hazard facility that are identified in a Quantitative Risk Assessment.</i></li> </ol> <p>Meridian is concerned that HAZS-R3 fails to clearly consider the potential reverse sensitivity effects of new sensitive activities on the effective and efficient operation and maintenance of existing major hazard facility and seeks that discretion be directly applied to such matters.</p>	<p>Amend HAZS-R3 as follows:</p> <p><b><i>Activity Status: RDIS</i></b></p> <p><b><i>Matters of discretion are restricted to:</i></b></p> <ol style="list-style-type: none"> <li><i>The risks associated with locating in proximity to the major hazard facility that are identified in a Quantitative Risk Assessment; <u>and</u></i></li> <li><i><u>The potential reverse sensitivity effects of the sensitive activity on the effective and efficient operation and maintenance of major hazard facilities.</u></i></li> </ol>



<b>HAZS-R4</b>  <b>Sensitive activities on the same site as a major hazard facility in all zones</b>	Support	<p>HAZS-R4 makes the establishment of a sensitive activity on the same site as a major hazard facility in all zones a non-complying activity.</p> <p>Meridian supports this approach so as to avoid potential reverse sensitivity effects on the effective and efficient operation and maintenance of the major hazard facility.</p>	Retain HAZS-R4 as notified.
<b>NH-O1</b>  <b>Risk from natural hazards</b>	Oppose in part	<p>NH-O1 reads:</p> <p><i>New subdivision, land use and development:</i></p> <ol style="list-style-type: none"> <li><i>1. is avoided in areas where the risks from natural hazards to people, property and infrastructure are assessed as being unacceptable; and</i></li> <li><i>2. in all other areas, is undertaken in a manner that ensures that the risks of natural hazards to people, property and infrastructure are avoided or appropriately mitigated.</i></li> </ol> <p>Concerning critical infrastructure, Meridian considers that this objective is not consistent with Policy 11.3.4 of the Canterbury Regional Policy (<b>CRPS</b>) which states that:</p> <p><i>New critical infrastructure will be located outside high hazard areas unless there is no reasonable alternative...</i></p> <p>NH-O1 does not reflect that there may be functional needs or operational needs for critical infrastructure to be located in specific locations, including locations at risk of natural hazards. For this reason, Meridian seeks insertion of a new objective that recognises and provides for such needs.</p>	<p>Provide separate objectives, policies and rules that apply to critical infrastructure by:</p> <ol style="list-style-type: none"> <li>1. Amending NH-O1 as follows: <p><i>New subdivision, land use and development <u>(except when related to critical infrastructure)</u>:</i></p> <ol style="list-style-type: none"> <li><i>1. is avoided in areas where the risks from natural hazards to people, property and infrastructure are assessed as being unacceptable; and</i></li> <li><i>2. in all other areas, is undertaken in a manner that ensures that the risks of natural hazards to people, property and infrastructure are avoided or appropriately mitigated.</i></li> </ol> </li> </ol> <p>and</p> <ol style="list-style-type: none"> <li>2. Insert a new objective as follows: <p><b><u>NH-O1A Critical Infrastructure</u></b></p> <p><u><i>New subdivision, use and development of land for critical infrastructure avoids increasing the risks of natural hazards to people, property and infrastructure or, where avoidance is not</i></u></p> </li> </ol>

			<u>practicable, mitigation measures minimise such risks.</u>
<b>NH-O2</b> <b>Critical infrastructure and specific buildings in Natural Hazard Overlays</b>	Oppose in part	It is possible that some <i>critical infrastructure</i> will also fit into the definition of <i>major hazard facility</i> . There may be functional needs or operational needs for critical infrastructure to be located in specific places, including places at risk of natural hazards. For this reason, Meridian considers that NH-O2 (2) should be amended to be clear that it does not address a major hazard facility that is also critical infrastructure.	Amend NH-O2 as follows: <ol style="list-style-type: none"> <li>1. <i>Critical infrastructure is located and designed to be resilient to the effects of natural hazards; and</i></li> <li>2. <i>Major hazard facilities <u>(other than major hazard facilities that are also critical infrastructure)</u>, education facilities or visitor accommodation activities avoid locating in areas of high natural hazard risk associated with surface fault rupture where the effects on occupants and neighbours are assessed as being unacceptable</i></li> </ol>
<b>NH-P4</b> <b>Flood hazards</b>	Support	NH-P4 reads:  <i>Within the Flood Hazard Assessment Overlay Area (except High Flood Hazard Areas), enable:</i> <ol style="list-style-type: none"> <li>1. <i>new non critical infrastructure, or the operation, maintenance, repair, replacement, upgrading of non critical infrastructure where the infrastructure does not increase flood risk on another site; and</i></li> <li>2. <i>the operation, maintenance, repair, replacement, upgrading of critical infrastructure where the infrastructure does not increase flood risk on another site; and</i></li> </ol>	Retain NH-P4 as notified.

		<p>3. <i>any other new subdivision, use and development only where every new natural hazard sensitive building has an appropriate floor level above the 500 year ARI design flood level.</i></p> <p>Meridian considers that this provision strikes an appropriate balance between enabling critical infrastructure in the Flood Hazard Assessment Overlay and minimising risks to human health and property associated with flooding.</p>	
<p><b>NH-P5</b></p> <p><b>High flood hazard area</b></p>	Support	<p>Concerning critical infrastructure, NH-P5 requires that new critical infrastructure in a High Flood Hazard Area is avoided unless:</p> <ul style="list-style-type: none"> <li>a. <i>there is a functional need or operational need to locate in that environment; and</i></li> <li>b. <i>the infrastructure is designed to be resilient to flood hazard as far as is practicable; and</i></li> <li>c. <i>the infrastructure is designed so as not to increase flood risk to people and property.</i></li> </ul> <p>Meridian considers that this provision strikes an appropriate balance between providing for critical infrastructure in the Flood Hazard Assessment Overlay and minimising risks to human health and property associated with flooding.</p>	Retain NH-P5 as notified.

<p><b>NH-P8</b></p> <p><b>Fault hazard risk to critical infrastructure and specific buildings</b></p>	<p>Oppose in part</p>	<p>NH-P8 reads:</p> <ol style="list-style-type: none"> <li>1. <i>Critical Infrastructure only locates within the Fault Hazard (Critical Infrastructure) Overlay where:</i> <ol style="list-style-type: none"> <li>a. <i>there is a functional need or operational need to locate in that environment; and</i></li> <li>b. <i>the infrastructure is designed to be resilient to surface fault rupture hazard as far as is practicable.</i></li> </ol> </li> <li>2. <i>Critical infrastructure, major hazard facilities, education facilities or visitor accommodation activities only locate within the Fault Hazard (Critical Infrastructure) Overlay where:</i> <ol style="list-style-type: none"> <li>a. <i>the building can be designed to manage the risks to people and property, and buildings on adjoining sites, to an acceptable level.</i></li> </ol> </li> </ol> <p>Meridian is concerned that provision 2. a. references <i>risk</i> too broadly, and this should be narrowed to read <i>risks resulting from a surface fault rupture hazard</i>.</p>	<p>Amend NH-P8 as follows:</p> <ol style="list-style-type: none"> <li>1. <i>Critical Infrastructure only locates within the Fault Hazard (Critical Infrastructure) Overlay where:</i> <ol style="list-style-type: none"> <li>a. <i>there is a functional need or operational need to locate in that environment; and</i></li> <li>b. <i>the infrastructure is designed to be resilient to surface fault rupture hazard as far as is practicable.</i></li> </ol> </li> <li>2. <i>Critical infrastructure, major hazard facilities, education facilities or visitor accommodation activities only locate within the Fault Hazard (Critical Infrastructure) Overlay where:</i> <ol style="list-style-type: none"> <li>a. <i>the building can be designed to manage the risks <u>resulting from a surface fault rupture hazard</u> to people and property, and buildings on adjoining sites, to an acceptable level.</i></li> </ol> </li> </ol>
<p><b>NH-R4</b></p> <p><b>New critical infrastructure in the Flood Hazard Assessment Overlay</b></p>	<p>Support</p>	<p>NH-R4 permits new critical infrastructure in the Flood Hazard Assessment Overlay where:</p> <ol style="list-style-type: none"> <li>1. <i>It is located outside a High Flood Hazard Area as stated in a Flood Hazard Assessment issued in accordance with NH-S1; and</i></li> <li>2. <i>The Flood Hazard Assessment is provided to Council.</i></li> </ol>	<p>Retain NH-R4 as notified</p>

		<p>Where 1. and 2. cannot be achieved, the activity is RDIS and the matters of discretion are limited to:</p> <ul style="list-style-type: none"> <li>a. <i>The extent to which infrastructure increases the natural hazard risk or transfers the risk to another site.</i></li> <li>b. <i>The ability for flood water conveyance to be maintained.</i></li> <li>c. <i>The extent to which there is a functional or operational requirement for the infrastructure to be located in the High Flood Hazard Area.</i></li> <li>d. <i>The extent to which the location and design of the infrastructure can address relevant natural hazard risk and appropriate measures that have been incorporated into the design to provide for the continued operation of the infrastructure.</i></li> <li>e. <i>Any positive effects from the proposal.</i></li> </ul> <p>Meridian considers that this provision strikes an appropriate balance between enabling critical infrastructure in the Flood Hazard Assessment Overlay and minimising risks to human health and property associated with flooding.</p>	
<b>NH-R6</b>  <b>New critical infrastructure, major hazard facilities, education facilities and visitor accommodation</b>	Oppose in part	<p>NH-R6 makes <i>new critical infrastructure</i> and <i>major hazard facilities</i> (amongst other activities) in the <i>Fault Hazard (Critical Infrastructure) Overlay</i> RDIS.</p> <p>The matters of discretion include (amongst others):</p> <ul style="list-style-type: none"> <li>a. <i>The extent to which there is a functional need or operational need for the critical</i></li> </ul>	<ol style="list-style-type: none"> <li>1. Retain matter of discretion a. as notified; and</li> <li>2. Amend the matters of discretion by adding the following:   <u><i>e. Any positive effects from the proposal</i></u> </li> </ol>

activities or extensions to existing critical infrastructure and major hazard facilities, education facilities and visitor accommodation activities in the Fault Hazard (Critical Infrastructure) Overlay		<p><i>infrastructure to be located in the Fault Hazard (Critical Infrastructure) Overlay.</i></p> <p>Meridian supports inclusion of a. and seeks that it be retained.</p> <p>Unlike NH-R4, the matters of discretion in NH-R6 do not include <i>Any positive effects from the proposal</i>. Meridian considers that to give effect to the NPS-REG, any positive effects from the proposal should be included in the matters of discretion in NH-R6. This amendment would ensure that an appropriate balance is struck between providing for critical infrastructure in the <i>Fault Hazard (Critical Infrastructure) Overlay</i> and minimising risks to human health and property.</p>	
NH-R8 Buildings and structures not otherwise provided for in the Ostler Hazard Area Overlay	Oppose in part	<p>Meridian is concerned that the <i>Fault Hazard (Critical Infrastructure) Overlay</i> lies over part of the area that is also covered by the <i>Ostler Fault Hazard Area Overlay</i>.</p> <p>Meridian considers that NH-R8 should be clear that critical infrastructure is not regulated by NH-R8, rather NH-R6 is the relevant rule.</p>	<p>Amend the activity descriptor of NH-R8 as follows:</p> <p><i>Buildings and Structures Not <u>Provided for by NH-R6 or Otherwise Provided For</u></i></p>
HI Introduction	Oppose in part	<p>Meridian requests that the HI Introduction is amended to be clear that the Waitaki Power Scheme infrastructure both contains water (for example behind dams) and conveys water (for example through canals) for hydro electricity generation purposes.</p>	<p>Amend HI Introduction as follows:</p> <p><i>There are eight hydro electricity stations within the District that are part of the Waitaki Power Scheme, spread between Takapō / Lake Tekapo and Lake Waitaki. <del>These hydro-electricity stations</del> <u>The Waitaki Power Scheme's infrastructure contains and</u> <del>infrastructure that</del> conveys water to support hydro electricity generation that meets local, regional and national needs. While the infrastructure is</i></p>

			<i>managed under best practice dam safety assurance programmes, there remains a risk that failure can occur, for example as a consequence of an extreme earthquake. While the likelihood of a structural failure is very low, the consequences can be serious for people and property....</i>
<b>HI-O1</b> <b>Hydro Inundation Hazard</b>	Support	Meridian considers that this provision strikes an appropriate balance between enabling landowners to develop and use their land and minimising risks to human health and property from possible hydro inundation. Further to this, HI-O1 also provides for the avoidance of reverse sensitivity effects which is generally consistent with the NPS-REG.	Retain HI-O1 as notified.
<b>HI-P1</b> <b>Development in Hydro Inundation Hazard Areas</b>	Support	Meridian considers that this provision strikes an appropriate balance between enabling landowners to develop and use their land and minimising risks to human health and property from possible hydro inundation. Further to this, HI-P1 also provides for the avoidance of reverse sensitivity effects which is generally consistent with the NPS-REG.	Retain HI-P1 as notified
<b>HI-R1</b> <b>New occupied buildings in the GRUZ within the Hydro Inundation Hazard Overlay</b>	Support	Meridian considers that this provision strikes an appropriate balance between enabling landowners to develop and use their land and minimising risks to human health and property from possible hydro inundation.	Retain HI-R1 as notified
<b>HI-R2</b>	Support	Meridian considers that this provision strikes an appropriate balance between enabling landowners to develop and use their land and minimising risks to	Retain HI-R2 as notified

<b>Residential units in RLZ within the Hydro Inundation Hazard Overlay</b>		human health and property from possible hydro inundation.	
<b>HI-R3</b> <b>Residential visitor accommodation in:</b> <b>GRUZ within the Hydro Inundation Hazard Overlay</b> <b>RLZ within the Hydro Inundation Hazard Overlay</b> <b>AIRPZ within the Hydro Inundation Hazard Overlay</b>	Support	Meridian considers that this provision strikes an appropriate balance between enabling landowners to develop and use their land and minimising risks to human health and property from possible hydro inundation.	Retain HI-R3 as notified
<b>HH-MD1</b> <b>Maintenance and Repairs, Alterations and Additions</b>	Oppose in part	<p><i>HH-R1 Maintenance and Repair of Items included in HH-SCHED2 and HH-R4 Additions and Alterations to the Exterior of Items included in HH-SCHED2 both rely on HH-MD1 Maintenance and Repairs, Alterations and Additions.</i></p> <p>Matter e. in HH-MD1 reads:</p> <p><i>"The extent to which the heritage fabric has been damaged by natural events, weather and environmental factors and the necessity of work to prevent further deterioration."</i></p> <p>Meridian has recently had to repair an item listed in HH-SCHED2 that was damaged as a result of vandalism.</p>	<p>Either:</p> <ol style="list-style-type: none"> <li>Amend HH-MD1 e. as follows: <ul style="list-style-type: none"> <li><i>The extent to which the heritage fabric has been damaged <del>by natural events, weather, and environmental factors</del> and the necessity of work to prevent further deterioration.</i></li> </ul> </li> </ol> <p>Or</p> <ol style="list-style-type: none"> <li>Amend HH-MD1 e. as follows: <ul style="list-style-type: none"> <li><i>The extent to which the heritage fabric has been damaged by natural events, weather,</i></li> </ul> </li> </ol>



		<p>While in this instance the repairs did not require a resource consent, there is potential for future vandalism or accidental events (e.g. traffic damage to a bridge) to lead to the need to repair a heritage item in a manner that does not comply with the conditions in HH-R1.</p> <p>HH-MD1 e. includes the extent to which damage has resulted from certain types of factors; however, it is unclear that vandalism or accidents would be considered part of “<i>environmental factors</i>”.</p> <p>Meridian seeks to remove the cause of damage from the matter of discretion as this is not relevant to considering the potential effects of any proposed maintenance and repair. By removing the reference to causes, the provision then focuses on the extent of damage and necessity of the repairs.</p>	<p><del>and</del> <i>environmental factors, <u>accident or vandalism</u> and the necessity of work to prevent further deterioration.</i></p>
<p><b>TREE-P2</b></p> <p><b>Protection of notable trees</b></p>	<p>Oppose in part</p>	<p>PC28 includes Variation 1 to PC26 which makes all provisions in the TREE Chapter apply to REG activities.</p> <p>The provisions in the TREE chapter fail to give effect to the requirements of the National Policy Statement for Renewable Electricity. In particular, the TREE Chapter does not give effect to Policy A of the NPS-REG which requires that decision-makers recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities.</p>	<p>Amend TREE-P2 as follows:</p> <p><i>Protect <u>as far as practicable</u> any tree or group of trees listed in TREE-SCHED1 from the adverse effects of subdivision, land use and development, by considering:</i></p> <ol style="list-style-type: none"> <li><i>1. whether the subdivision, use or development provides for the protection of the tree or trees;</i></li> <li><i>2. methods to contain and control plant pathogens and diseases including measures for preventing the spread of soil and the safe disposal of plant material; and</i></li> </ol>

			<p>3. <i>the provision and implementation of a tree management plan in accordance with best arboricultural practice-; and</i></p> <p>4. <i><u>the functional needs or operational needs to locate critical infrastructure in a place that would require the destruction or removal of any tree or group of trees listed in TREE-SCHED1.</u></i></p>
<p><b>TREE-P5</b></p> <p><b>Destruction or removal of notable trees</b></p>	<p>Oppose in part</p>	<p>PC28 includes Variation 1 to PC26 which makes all provisions in the TREE Chapter apply to REG activities.</p> <p>The provisions in the TREE chapter fail to give effect to the requirements of the National Policy Statement for Renewable Electricity. In particular, the TREE Chapter does not give effect to Policy A of the NPS-REG which requires that decision-makers recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities.</p>	<p>Amend TREE-P5 as follows:</p> <p><i>Only allow the destruction or removal of Notable Trees listed in TREE-SCHED1, where:</i></p> <ol style="list-style-type: none"> <li><i>1. the tree is certified as being dead or in terminal decline by a qualified arborist; or</i></li> <li><i>2. the destruction or removal of the tree is necessary to avoid adverse effects of the tree on public safety, or damage to property or infrastructure; or</i></li> <li><i>3. the use and enjoyment of a property and surrounds is significantly compromised or diminished; or</i></li> <li><i>4. <u>there is a functional need or operational need to locate critical infrastructure in a place that would require the destruction or removal of Notable Trees listed in TREE-SCHED1.</u></i></li> </ol>
<p><b>SUB-R7E</b></p> <p><b>Subdivision where any part of any proposed allotment</b></p>	<p>Oppose in part</p>	<p>Meridian generally supports new rule SUB-R7E, which addresses <i>Subdivision where any part of any proposed allotment is within the Hydro Inundation Hazard Overlay</i>,</p>	<ol style="list-style-type: none"> <li>1. Concerning the part of SUB-R7E that applies in the <i>General Rural Zone within the Hydro Inundation Hazard Overlay</i>, amend as follows:</li> </ol> <p><b>Activity Status: RDIS</b></p>

<p>is within the Hydro Inundation Hazard Overlay</p>		<p>however, Meridian considers that there is a drafting error in this rule.</p>	<p><del><b>Matters of discretion are restricted to:</b></del></p> <p><del><i>a. The potential effects of hydro inundation on people, buildings and structures.</i></del></p> <p><del><i>And the Where the</i></del> activity complies with the following standards:</p> <p><i>SUB-S1 Allotment Size and Dimensions</i></p> <p><i>SUB-S2 Property Access</i></p> <p><i>SUB-S3 Water supply</i></p> <p><i>SUB-S4 Wastewater Disposal</i></p> <p><i>SUB-S5 Walkable Blocks</i></p> <p><i>SUB-S6 Corner Splays</i></p> <p><i>SUB-S7 Electricity Supply and Telecommunications</i></p> <p><i>SUB-S10 Stormwater Disposal</i></p> <p><i>PA-S1 Esplanade Requirements</i></p> <p><b>Matters of discretion are restricted to:</b></p> <p><u><i>The potential for the subdivision to increase adverse effects of hydro inundation on people, buildings and structures, and</i></u></p> <p><i>SUB-MD1 Design</i></p> <p><i>SUB-MD2 Infrastructure</i></p> <p><i>SUB-MD3 Water Supply</i></p> <p><i>SUB-MD4 Stormwater Disposal</i></p> <p><i>SUB-MD5 Transportation Networks</i></p>
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			<p><i>SUB-MD6 Easements</i></p> <p><i>SUB-MD7 Reverse Sensitivity</i></p> <p><i>SUB-MD8 Public Access</i></p> <p><i>SUB-MD9 Wastewater Disposal</i></p> <p>2. Concerning the part of SUB-R7E that applies in the <i>Rural Lifestyle Zone within the Hydro Inundation Hazard Overlay</i>, retain the notified version which makes subdivision in this area a non-complying activity.</p>
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## APPENDIX 2

### PC29 – Open Space & Recreation Zones, Noise, Signs & Temporary Activities, Variation 1 to PC23, Variation 2 to PC26 & Variation to PC27

PC29 Provision	Support or Oppose	Reasons	Relief Sought
<b>NOISE-O1 Noise</b>	Oppose in part	<p>PC29 makes all provisions in the Noise Chapter apply to REG activities.</p> <p>As notified, NOISE-O1 can be read as inappropriately protecting the status quo. To achieve the objective, the functional needs and operational needs of critical infrastructure could be overlooked, and this would be inconsistent with the NPS-REG.</p> <p>Meridian prefers wording that focuses on ensuring that activities do not adversely affect the health and well-being of people and communities, similar to the Noise Objective in Section 14 - Temporary Activities and Buildings and Environmental Noise of the current MDP.</p>	<p>Either:</p> <ol style="list-style-type: none"> <li>Amend NOISE-O1 as follows:  <i><del>The effects of noise Noise is consistent with the purpose, and anticipated character and qualities of the receiving environment, and maintains the</del> <u>are not adverse to the</u> health and well-being of people and communities.</i> </li> <li>Or</li> <li>Amend NOISE-O1 as follows, or with words of similar effect:  <i>Noise is consistent with the purpose, and anticipated character and qualities of the receiving environment, <u>while recognising and providing for the functional needs and operational needs of critical infrastructure</u>, and maintains the health and well-being of people and communities.</i> </li> </ol>
<b>NOISE-P1 Noise effects</b>	Oppose in part	<p>NOISE-P1 fails to recognise that critical infrastructure, such as renewable electricity generation, can have functional needs and operational needs to be located in particular places.</p> <p>For this reason, NOISE-P1 is not consistent with Policy A of the NPS-REG which requires that decision-makers</p>	<p>Amend NOISE-P1 as follows:</p> <p><i>Manage noise effects to maintain the character and amenity anticipated in the area in which the effects are received, taking into account the</i></p>

		recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities.	<i>nature, frequency, <del>and</del> duration <u>and benefits</u> of the activity generating the noise.</i>
<b>NOISE-P2</b> <b>Reverse sensitivity</b>	Oppose in part	<p>NOISE-P2 fails to recognise that critical infrastructure, such as renewable electricity generation, can have functional needs and operational needs to be located in particular places and should be protected from reverse sensitivity effects.</p> <p>For this reason, NOISE-P2 is not consistent with Policy A of the NPS-REG which requires that decision-makers recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities.</p>	<p>Amend NOISE-P2 as follows:</p> <p><i>Manage noise sensitive activities in proximity to <u>critical infrastructure, State Highways and Airports</u>, and <del>within</del> the Town Centre Zone, to protect <u>such infrastructure and the Town Centre Zone</u> <del>them</del> from reverse sensitivity effects.</i></p>
<b>NOISE-R1</b> <b>Noise generating activity not otherwise listed</b>	Support	<p>NOISE-R1 states that noise generating activities that are not otherwise listed are permitted activities where they do not exceed the limits set out in NOISE-TABLE 1. Where the limits in NOISE-TABLE 1 cannot be complied with, the activity is a RDIS, and the matters of discretion are limited to NOISE-MD1 Noise Effects. NOISE-MD1 Noise Effects includes <i>the benefits of the activity generating noise</i>.</p> <p>Meridian supports NOISE-R1 and considers that it goes some way to being consistent with the NPS-REG.</p>	Retain NOISE-R1 as notified.
<b>NOISE-R17</b> <b>Any new building containing a noise sensitive activity, or the alteration of an</b>	Oppose in part	Meridian considers that the application of this rule needs to be extended to address noise sensitive activities within 500m of any critical infrastructure. This recognises that critical infrastructure, such as renewable electricity generation, can have functional needs and operational	<p>Amend NOISE-R17 as follows:</p> <p><i>Any New Building Containing a Noise Sensitive Activity, or the Alteration of an Existing Building which Creates a New Habitable Room, or the Use of an Existing Building for a New Noise Sensitive</i></p>

<p><b>existing building which creates a new habitable room, or the use of an existing building for a new noise sensitive activity, within 500m of any special purpose airport zone</b></p>		<p>needs to be located in particular places and should be protected from reverse sensitivity effects.</p> <p>Without protecting renewable electricity generation activities from the potential for reverse sensitivity effects to arise, the NOISE chapter is not consistent with Policy A of the NPS-REG which requires that decision-makers recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities.</p>	<p><i>Activity, within 500m of any Special Purpose Airport Zone <u>or within 500m of any critical infrastructure</u></i></p>
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### **APPENDIX 3**

#### **PC30 – Special Purpose Zones, Variation 2 to PC23, Variation 3 to PC26 and Variation 3 to PC27**

<b>PC30 Provision</b>	<b>Support or Oppose</b>	<b>Reasons</b>	<b>Relief Sought</b>
<b>Definition of <i>Airport activity</i></b>	Support	<p>The notified definition of <i>Airport activity</i> reads:</p> <p><i>means land and buildings used wholly or partly for the landing, departure, and surface movement of aircraft (including fixed wing, helicopter, rotary, hot air balloons, and unmanned aerial vehicles) for aviation related activity including:</i></p> <ul style="list-style-type: none"><li><i>a. Aircraft take-off and landing operations.</i></li><li><i>b. Runways, taxiways, aircraft parking aprons, and other aircraft movement areas.</i></li><li><i>c. Commercial and general aviation including buildings and facilities for aircraft maintenance, servicing and testing, aircraft component manufacture, airport or aircraft training facilities, aviation schools and associated offices.</i></li><li><i>d. Aviation research and testing laboratories.</i></li><li><i>e. Terminal buildings and facilities for aircraft arrivals and departures including waiting rooms, booking facilities together with baggage and freight and including facilities for management and maintenance of the airport.</i></li></ul>	Retain the definition of <i>Airport activity</i> as notified.



		<p><i>f. Hangars, air traffic control towers and facilities, navigation and safety aids, rescue facilities, lighting, car parking, air freight forwarding and air cargo warehousing, maintenance and service facilities, airline depots, cabin and catering services, fuel storage and fuelling facilities and facilities for the handling and storage of hazardous substances for the purpose of airport operation.</i></p> <p>Meridian considers that this list is comprehensive and reflects activities that for operational needs must be located in an airport facility.</p>	
<b>Definition of <i>Airport building</i></b>	Support	<p>The notified definition of <i>Airport building</i> reads:</p> <p><i>means any building constructed for the purpose of conducting an airport activity.</i></p> <p>Meridian considers that, in combination with the definition of <i>airport activity</i>, the definition of <i>airport building</i> is comprehensive and appropriate.</p>	Retain the definition of <i>Airport building</i> as notified.
<b>Definition of <i>Airport support activity</i></b>	Support	<p>The notified definition of <i>Airport support activity</i> reads:</p> <p><i>means land and buildings used for terminal support and airport accessory uses, such as car parking, conference rooms, restaurants, shops, recreation facilities, rental car storage and maintenance, service stations, bus and taxi terminals and other commercial activities which directly serve development and personnel at the airport. It does not include any accommodation related activity.</i></p>	Retain the definition of <i>Airport support activity</i> as notified.

		Meridian considers that this definition is comprehensive and appropriate.	
<b>AIRPZ-O1</b> <b>Zone purpose</b>	Oppose in part	Concerning the Pūkaki Airport, Meridian is concerned that AIRPZ-O1 is too broad and could be read to include activities that are not related to airport activities, airport support activities and aviation related residential or visitor accommodation (for example, non-airport related commercial and industrial activities). Meridian considers that the potential risks posed by the location of the Pūkaki Airport in the Hydro Inundation Hazard Overlay warrants constraining the activities undertaken at the Pūkaki Airport to core airport and airport related activities only.	<p>1. Amend AIRPZ-O1 as follows, or words of similar effect:</p> <p><i><u>Concerning airports located outside the Hydro Inundation Hazard Overlay, the efficient use and development of airport zoned land and facilities <del>to</del> supports the economic and social well-being of Te Manahuna/the Mackenzie District.</u></i></p> <p>And</p> <p>2. Insert new objective AIRPZ-O1A as follows, or words of similar effect:</p> <p><i><u>Concerning airports located inside the Hydro Inundation Hazard Overlay, the efficient use and development of airport zoned land and facilities for airport activities, airport support activities, aviation related residential units or activities, or aviation related visitor accommodation supports the economic and social well-being of Te Manahuna/the Mackenzie District.</u></i></p>
<b>AIRPZ-O2</b> <b>Zone character and amenity values</b>	Oppose in part	<p>Meridian considers that AIRPZ-O2 matter 1. duplicates the content of AIRPZ-O1 and should be deleted from AIRPZ-O2.</p> <p>Meridian considers that AIRPZ-O2 matter 2. is unclear in its use of “and related supporting activities”. This provision would be clearer by using the term “airport support activities” which is defined in PC30.</p>	<p>Amend AIRPZ-O2 as follows:</p> <p><i>The use of land within the AIRPZ is managed in a way that:</i></p> <p><i><del>1. Provides for economic and social benefits to the region;</del></i></p> <p><i>2. Recognises the functional needs and operational needs of airport <u>activities and</u></i></p>

			<p><u>airport support activities and related supporting activities;</u></p> <p>3. The efficient use and development of airports is not constrained or compromised by incompatible activities establishing within the AIRPZ; and</p> <p>4. Achieves a high standard of amenity reflective of the role and function of the AIRPZ, but also does not compromise the landscape character and visual amenity of the surrounding Te Manahuna/Mackenzie Basin ONL.</p>
<p><b>AIRPZ-P2</b></p> <p><b>Other activities</b></p>	Oppose	<p>Concerning the Pūkaki Airport, Meridian is concerned that AIRPZ-P2 is too broad and could lead to the establishment of activities that are not related to airport activities, airport support activities and aviation related residential or visitor accommodation (for example, non-airport related commercial and industrial activities). Meridian considers that the potential risks posed by the location of the Pūkaki Airport in the Hydro Inundation Hazard Overlay warrants constraining the activities undertaken at the Pūkaki Airport to core airport and airport related activities only.</p>	<p>1. Amend AIRPZ-P2 as follows:</p> <p><u>Concerning airports located outside the Hydro Inundation Hazard Overlay, avoid <del>Avoid</del> non-airport related commercial, industrial and other activities unless they:</u></p> <ol style="list-style-type: none"> <li>1. Are compatible with the ongoing safe and efficient operation and function of airports;</li> <li>2. Are compatible with the character and amenity values anticipated within the AIRPZ; and</li> <li>3. Do not detract from the existing commercial centres in Takapō/Lake Tekapo or Twizel.</li> </ol> <p>And</p> <p>2. Insert new policy AIRPZ-P2A as follows:</p> <p><u>Concerning airports located inside the Hydro Inundation Hazard Overlay, avoid activities that</u></p>

			<u>are not airport activities, airport support activities, residential units or activities, aviation related visitor accommodation, or earthworks associated with the preceding activities.</u>
<b>AIRPZ-R1</b> <b>Airport activity</b>	Support	AIRPZ-R1 permits <i>Airport activities</i> in the AIRPZ, subject to compliance with standards. Provided that the notified definition of <i>Airport activity</i> is retained, Meridian generally supports AIRPZ-R1.	Retain AIRPZ-R1 as notified.
<b>AIRPZ-R2</b> <b>Airport support activity</b>	Support	AIRPZ-R2 permits <i>Airport support activities</i> in the AIRPZ, subject to compliance with standards. Provided that the notified definition of <i>Airport support activity</i> is retained, Meridian generally supports AIRPZ-R2.	Retain AIRPZ-R2 as notified.
<b>AIRPZ-R3</b> <b>Residential unit / Residential activity</b>	Oppose in part	It is possible that an airport building may provide for a combination of residential, staff and visitor accommodation. Meridian considers that the potential risks posed by the location of the Pūkaki Airport in the Hydro Inundation Hazard Overlay warrants constraining the maximum occupancy of an airport building to a combined total of not more than 6 people per night, made up of residential persons, staff and aviation related visitors.	Amend AIRPZ-R3 as follows:  <i>Activity Status: PER</i>  <i>Where:</i>  <u>1. The use is contained within an airport building and the maximum combined total gross floor area of any residential, staff accommodation and aviation related visitor accommodation does not exceed 150m<sup>2</sup>; and</u>  <u>2. Concerning a residential unit/residential activity in airports located inside the Hydro Inundation Hazard Overlay, the combined residential occupancy, staff occupancy and aviation related visitors does not exceed six persons per night per airport building.</u>

<b>AIRPZ-R4</b>  <b>Staff accommodation</b>	Oppose in part	<p>Provided that the notified definitions of <i>Aviation related visitor accommodation</i>, <i>Airport building</i>, <i>Airport activity</i> and <i>Airport support activity</i> are retained, Meridian generally supports AIRPZ-R4. This reflects the need to constrain activities in the Pūkaki Airport area of AIRPZ to activities that have an operational need to be located in this area thereby minimising unnecessary risks associated with this airport being in the Hydro Inundation Hazard Overlay.</p> <p>At the same time, Meridian is concerned that it is possible that an airport building may provide for a combination of residential, staff and visitor accommodation. Meridian considers that the potential risks posed by the location of the Pūkaki Airport in the Hydro Inundation Hazard Overlay warrants constraining the permitted maximum occupancy per building to a combined total of not more than 6 people per night, made up of residential persons, staff and aviation related visitors.</p>	<p>Amend AIRPZ-R4 as follows:</p> <p>Activity Status: PER</p> <p>Where:</p> <ol style="list-style-type: none"> <li>1. <i>The use is contained within an airport building and the maximum combined total gross floor area of any residential, staff accommodation and aviation related visitor accommodation does not exceed 150m<sup>2</sup>; and</i></li> <li>2. <u><i>Concerning airports located outside the Hydro Inundation Hazard Overlay, the <del>The</del> maximum occupancy does not exceed six staff per night; and</i></u></li> <li>3. <u><i>Concerning staff accommodation in airports located inside the Hydro Inundation Hazard Overlay, the combined residential occupancy, staff occupancy and aviation related visitors does not exceed six persons per night.</i></u></li> </ol>
<b>AIRPZ-R5</b>  <b>Aviation related visitor accommodation</b>	Oppose in part	<p>Provided that the notified definitions of <i>Aviation related visitor accommodation</i>, <i>Airport building</i>, <i>Airport activity</i> and <i>Airport support activity</i> are retained, Meridian generally supports AIRPZ-R5.</p> <p>This reflects the need to constrain activities in the Pūkaki Airport area of AIRPZ to activities that have a need to be located in this area thereby minimising unnecessary risks associated with this airport being in the Hydro Inundation Hazard Overlay.</p>	<p>Amend AIRPZ-R5 as follows:</p> <p>Activity Status: PER</p> <p>Where:</p> <ol style="list-style-type: none"> <li>1. <i>The use is contained within an airport building and the maximum combined total gross floor area of any residential, staff accommodation and aviation related visitor accommodation does not exceed 150m<sup>2</sup>; and</i></li> </ol>

		At the same time, Meridian is concerned that it is possible that an airport building may provide for a combination of residential, staff and visitor accommodation. Meridian considers that the potential risks posed by the location of the Pūkaki Airport in the Hydro Inundation Hazard Overlay warrants constraining the permitted maximum occupancy of an airport building to a combined total of not more than 6 people per night, made up of residential persons, staff and aviation related visitors.	<p>2. <u>Concerning airports located outside the Hydro Inundation Hazard Overlay, the <del>The</del> maximum occupancy does not exceed six guests per night; and</u></p> <p>3. <u>Concerning aviation related visitor accommodation in airports located inside the Hydro Inundation Hazard Overlay, the combined residential occupancy, staff occupancy and aviation related visitors does not exceed six persons per night.</u></p>
<b>AIRPZ-R8</b> <b>Activities not otherwise listed</b>	Oppose in part	<p>AIRPZ-R8 makes <i>Activities not otherwise listed</i> in this chapter a discretionary activity in the AIRPZ.</p> <p>Concerning the Pūkaki Airport (which is located in the Hydro Inundation Hazard Overlay) Meridian opposes this rule since Rules AIRPZ-R1 to AIRPZ-R7 (inclusive) are a comprehensive list of activities (subject to the changes sought in Meridian's relief addressing these provisions) that are appropriate in the part of the AIRPZ that resides in the Hydro Inundation Hazard Overlay.</p> <p>Meridian considers that, along with the activities addressed in Rules AIRPZ-R9 to AIRPZ-R11 (inclusive), any other activity in that part of the AIRPZ that resides in the Hydro Inundation Hazard Overlay that is not otherwise identified in this chapter should be a non-complying activity.</p>	<p>1. Amend AIRPZ-R8 as follows:</p> <p><b><u>AIRPZ-R8 Outside the Hydro Inundation Hazard Overlay Activities Not Otherwise Listed</u></b></p> <p><b><u>Activity Status: DIS</u></b></p> <p>And</p> <p>2. Insert new rule AIRPZ-R8A as follows:</p> <p><b><u>AIRPZ-R8A Inside the Hydro Inundation Hazard Overlay Activities Not Otherwise Listed</u></b></p> <p><b><u>Activity Status: NC</u></b></p>
<b>AIRPZ-R9</b> <b>Residential visitor accommodation</b>	Support	AIRPZ-R9 makes <i>Residential visitor accommodation</i> a non-complying activity in the <i>Special Purpose Airport Zone</i> .	Retain AIRPZ-R9 as notified.

		Meridian supports this rule, particularly with respect to the Pūkaki Airport which lies in the Hydro Inundation Hazard Overlay.	
<b>AIRPZ-R10</b> <b>Commercial visitor accommodation</b>	Support	<p>AIRPZ-R10 makes <i>Commercial visitor accommodation</i> a non-complying activity in the <i>Special Purpose Airport Zone</i>.</p> <p>Meridian supports this rule, particularly with respect to the Pūkaki Airport which lies in the Hydro Inundation Hazard Overlay.</p>	Retain AIRPZ-R10 as notified.
<b>AIRPZ-R11</b> <b>Planting of any wildling conifers</b>	Support	<p>AIRPZ-R11 makes <i>Planting of any wildling conifers</i> a non-complying activity where the planting is for a scientific or research purpose and has been exempted under the Biosecurity Act 1993.</p> <p>In all other cases the activity is a prohibited activity.</p> <p>Meridian considers that this rule is appropriate both in terms of controlling the spread of wildling pines and preventing unnecessary obstructions in the Pūkaki Airport area which is in the Hydro Inundation Hazard Overlay.</p>	Retain AIRPZ-R11 as notified.