

28 August 2008

Horizons Regional Council
Private Bag 11025
Manawatu Mail Centre
Palmerston North

Attention: Hearings Panel: Proposed One Plan
c/- Robyn Harrison,
Hearings Administrator

Boffa Miskell



By email: robyn.harrison@horizons.govt.nz

Dear Sir/Madam

**RE: SUBMISSIONS AND FURTHER SUBMISSIONS MADE BY
MERIDIAN ENERGY LIMITED TO THE MANAWATU-
WANGANUI REGIONAL COUNCIL ON THE PROPOSED ONE
PLAN – CHAPTERS 9 AND 17, COASTAL**

Meridian Energy Limited ('Meridian') lodged submissions and further submissions to Chapters 9 and 17 regarding coastal management in the Proposed One Regional Plan ('Proposed Plan'). Further Meridian has now had the opportunity to consider the section 42A report which addresses these submissions, being the "Horizons Regional Council's Planners Report on submissions to the Proposed One Plan – Coastal (July 2008)", ('the section 42A report').

Meridan wishes to advise the Hearings Panel having considered the section 42A report, the company does not wish to present evidence at the forthcoming hearings on Chapters 9 and 17 of the Proposed Plan.

Meridian considers the matters it wishes to raise with the Hearings Panel regarding the provisions in Chapter 9 and 17 and the recommendations in the section 42A report can be adequately dealt with by way of this written correspondence.

This approach is considered to be consistent with the intent of recent directions from the Chairperson of the Hearings Panel, seeking the efficient use of available hearing time.

Accordingly Meridian wishes to draw to the attention of the Hearings Panel, the matters set out below, in relation to the Chapters 9 and 17 of the Proposed Plan.

Chapters 9 and 17 of Proposed One Plan and Renewable Energy Generation

As outlined in detail, in the primary submissions lodged by Meridian and the planning evidence for Meridian on Chapter 3, Infrastructure, Energy and Waste, Proposed Plan (previously submitted to the Hearings Panel), Meridian seeks the Plan recognise and provide for the use and development of renewable energy resources in the region including in the coastal environment. Further that corresponding objectives, policies and methods (including rules) are included through out the Plan which recognise the use and development of the region's renewable energy resources as matter of regional significance, and that renewable energy generation is enabled to greater extent than other resource use activities in the region. This management approach is consistent section 5 and Part 2 of the RMA (including the matters introduced by the RMA (Energy and Climate Change) Amendment Act 2004 and a number of national policy and strategy documents.

With respect to Chapters 9 and 17 of the Proposed Plan, Meridian's primary submission sought the provisions in these chapters be strengthened to give better recognition to the use and development of renewable energy generation in the coastal environment.

With respect to Chapter 9, Coast, the section 42A report states there is no need to repeat the provisions in Chapter 3, Infrastructure, Energy and Waste in Chapter 9. Further it states "*the Coast chapter is not intended to be a stand-alone chapter, rather it is intended to be read in conjunction with other chapter of the POP*".¹

Meridian wishes to advise the Hearings Panel that it generally accepts this comment in section 42A report. However the company continues to strongly support the inclusion of any cross-referencing in Chapters 9 and 17 to the provisions in Chapter 3 of the Plan. In particular recognition of the objectives and policies in Chapter 3 which recognise the use and development of the region's renewable energy resources as a matter of regional significance and that the development of renewable energy generation is enabled to greater extent than other resource use activities in the region.

Policy 17-2: Consent decision making for occupation of space by other activities and Policy 17-4: Consent decision making for new structures, Chapter 17, Proposed One Plan

In a manner consistent with the comments above, Meridian also wishes to advise the Hearings Panel that it supports the recommendations in the section 42A report, to insert a new clause (b) being "*to have particular regard to objective 3-1 and policies 3-1 to 3-5 in Policies 17-2 and 17-4 of the Plan*".² These changes are consistent with Meridian's overall submission seeking the strengthening of the

¹ Refer Page 26 of the section 42A report

² Refer Page 101 and 105 of section 42A report

references providing for the use and development of renewable energy generation throughout the Plan.

In summary, Meridian supports the strengthening of the Plan to ensure that the objectives and policies in Chapter 3 regarding providing for renewable energy generation in the region are considered in conjunction with the objectives and policies in other chapters of the Plan including Chapters 9 and 17, when making determinations on resource consent and plan development processes in the region.

Yours faithfully



Catherine Clarke
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for: Meridian Energy Limited

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