

Proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5:00pm Friday 8 March 2024.

Who can make a Further Submission?

A Further Submission may be made by any person who:

- Represents a relevant aspect of the public interest; or
- Has an interest in the proposal that is greater than the interest of the general public. (an explanation for the reasoning behind why you qualify for either of these categories must also be provided); or
- The local authority itself.

More information on the [Natural Resources Plan, Plan Change 1](#) and on the [consultation and submission processes](#) please visit our website.

How to make a Further Submission:

1. You can use the [online submission portal](#); or
2. You can use the Further Submission Form(s) (Form 6).
 - [This Further Submission Form\(s\) \(Form 6\) – Microsoft Word version](#); or
 - [Further Submission Form\(s\) \(Form 6\) – Microsoft Excel version](#).Please send the Further Submission Form in by one of the below methods:
 - Email it to the regionalplan@gw.govt.nz.
 - Post it to: [PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Advisor](#).
 - Drop it off at reception at one of our offices, marked ATT: Hearings Advisor.

Due to delays in postal services and the timeframe for making Further Submissions, we highly recommend that an electronic copy of your Further Submission is provided by the closing date.

Further Submission Form requirements:

- All sections of this form need to be completed for the Further Submission to be accepted.
- You must send a copy of your Further Submission to the original submitter. Any person making a Further Submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington. Each submitter has an address for service available on our [website](#). If you have made a Further Submission on several original submissions, then copies of your Further Submission will need to be served with each original submitter.

1. Details of further submitter	
Name of Submitter: (First and last name, or organisation / company)	Meridian Energy Limited
Address for service: (Email, or physical address) Please note an <u>email address</u> is the	P O Box 2128 Christchurch Email: Andrew.Feierabend@MeridianEnergy.co.nz

preferred method	
Phone: (Optional)	
Contact person for submission: (If different to above)	As above (Andrew Feierabend)
I wish to be heard in support of my submission at a hearing:	Yes
I would consider presenting a joint case at the hearing with others who make a similar submission:	Yes
2. Criteria applicable to Further Submitter:	
Only certain people may make further submissions Please select the option that applies to you:	
A) I am a person representing a relevant aspect of the public interest; or	Yes
B) I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or	Yes
C) I am the local authority for the relevant area.	No
Specify the reasoning behind why you qualify for either of these above options:	Please see covering letter.

3. For the further submitter to action
<p>Service of your further submission:</p> <p>Please note that any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</p> <p>Each submitter has an address for service available at: www.gw.govt.nz/nrp-pc1-submissions.</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>

4. Disclosures:		
If submitting on behalf of a company / organisation:		
I confirm that I have permission to provide this information on behalf of the company / organisation		08.03.2024
<p>Public information:</p> <p>Note that under the RMA all submissions and accompanying data must be made available for public inspection. To achieve that, Greater Wellington Regional Council will publish all Further Submissions and accompanying data on our website.</p> <p>In providing a further submission on the Natural Resources Plan, Plan Change 1, you confirm that you have read and understood the Plan Change 1 to the Natural Resources Plan Information Statement.</p> <p>You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at privacy@gw.govt.nz.</p>		

5. Further Submission:
<ul style="list-style-type: none"> The original submissions received have been summarised into submission points and collated into one summary table. This document(s) is a Summary of Decisions Requested: <ul style="list-style-type: none"> NRP PC 1 - Summary of Decisions Requested – By Submitter NRP PC 1 - Summary of Decisions Requested – By Provision

- Further submitters can submit on multiple submission points (identified in the Summary of Decisions Requested above) within the following section. Please use additional pages if necessary.
- If you are providing suggested text amendments to a provision, please do so in the following format:
Suggested added text, shown as **bolded text** format
Suggested deleted text, shown as ~~strikethrough~~ format

Meridian's further submission points are detailed in the attached table

Friday, March 8, 2024

The Chief Executive
Greater Wellington Regional Council
P O Box 11646
Manners Street
Wellington 6142

By email: regionalplan@gw.govt.nz

Kia ora

**PROPOSED CHANGE 1 TO THE NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION:
FURTHER SUBMISSIONS OF MERIDIAN ENERGY LIMITED**

I attach the further submissions of Meridian Energy Limited (**Meridian**) on submissions lodged on Proposed Change 1 to the Natural Resources Plan for the Wellington Region (**PC1**).

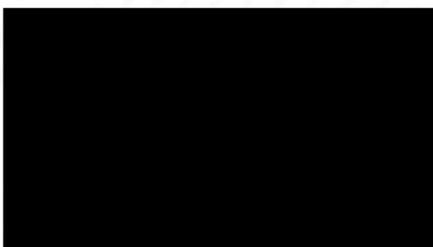
Meridian is a mixed ownership company in which the New Zealand Government retains a majority ownership. Meridian operates two wind farms in the Wellington Region. Meridian's core business of generating, marketing, trading and retailing electricity from renewable sources and the management of assets and ancillary structures for these purposes will be directly affected by the amendments proposed by PC1. Accordingly, Meridian is an entity with an interest in PC1 that is greater than the interest the general public has in PC1.

Meridian's submission points, including requested relief and reasons, are set out in the attached table. I also attach completed Form 6.

Meridian would welcome an opportunity to participate in pre-hearing meetings, including with other submitters, to explore amendments to address the attached submission points.

Please don't hesitate to contact me if there are any matters that you or your Team wish to clarify or to discussion refinements to the proposed District Plan provisions that would address Meridian's requested relief.

Ngā mihi



Andrew Feierabend
Environmental Manager

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
Submission Points Requesting Withdrawal of PC1:			
Meridian supports in part the submissions that seek the withdrawal of PC1 in its entirety.	<p>Including the following submission points:</p> <p>Jo McCready (S94.001)</p> <p>Gillies Group Management Ltd (S161.001)</p> <p>Pukerua Holdings Ltd (S165.001, S165.002, S165.004)</p> <p>Koru Homes NZ Ltd (S169.041, S169.042, S169.043, S169.044, S169.045, S169.046, S169.047, S169.048, S169.049)</p> <p>Arakura Plains Development Ltd (S173.001)</p> <p>Tracy Simms (S175.001)</p> <p>Cuttriss Consultants Ltd (S219.002, S219.004, S219.005)</p> <p>Terawhiti Farming Co Ltd (S224.001, S224.002, S224.003, S224.004, S224.005)</p> <p>Te Kamaru Station Ltd (S229.001, S229.002, S229.003, S229.004, S229.005)</p> <p>Te Marama Ltd (S230.001)</p> <p>Pukerua Property Group Ltd (S241.001, S241.003, S241.004, S241.007, S241.14)</p>	Support in part	<p>Meridian is concerned that proposed PC1 has been promulgated without consultation with all providers of regionally significant infrastructure and without proper consideration of the particular operational and functional needs of regionally significant infrastructure, including Meridian's lawfully established renewable electricity generation wind farms. Proposed PC1 raises potentially significant adverse operational impacts for regionally significant infrastructure, including renewable electricity generation activities, that conflict with the National Policy Statements for Renewable Electricity Generation and Electricity Generation. Proposed PC1 also overrides or upends, without reasonable cause, provisions in the operative NRP for regionally significant infrastructure that were settled by agreement (including the agreement of GWRC) only recently through mediation of appeals on the NRP. Meridian considers that the particular issues of conflict raised in the following submission are capable of resolution by providing appropriate exclusions or exemptions for regionally significant infrastructure (and particularly for lawfully established existing regionally significant infrastructure). These exclusion or exemption provisions are necessary in order for the region's urban and rural communities to function effectively and efficiently, and to enable achievement of the nation's objectives relating to adaptation to climate change. These objectives include enabling increased electricity generation from renewable sources;</p> <p>Decision requested: Allow the submission points and withdraw PC1 or, as alternative relief, make the amendments to PC1 detailed in the following further submission points (or</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Land Matters Ltd (S243.033, S243.034)</p> <p>Carrus Corporation Ltd (S247.002, S247.003, S247.004, S247.005)</p> <p>Thames Pacific (S252.002, S252.004, S252.005)</p> <p>Best Farm Ltd (S254.004)</p> <p>Woodridge Holdings Ltd (S255.001)</p>		such further or other relief as will achieve the outcome sought by the submission points).
Definition of 'Earthworks'			
<p><u>For Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua only:</u> <u>The alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts. Except that, for the purposes of Rules WH.R20, WH.R21 and P.R19, P.R20, 'earthworks' has the same meaning as given in section 3 of the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.</u> <u>For all other whaitua:</u></p>	<p>Horokiwi Quarries S2.009</p> <p>Requests reinstatement of the original NRP definition, with the exclusions contained therein and amendment to make them disjunctive using the word 'or' (including for the construction, repair, upgrade or maintenance of pipelines or electricity lines and their support structures, including the national grid and the repair or maintenance of existing roads and tracks and the repair, sealing or resealing of a road or driveway).</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S2.009.</p>
	<p>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand S41.001</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>The disturbance of a land surface from the time soil is first disturbed on a site until the time the site is stabilised. Earthworks includes blading, contouring, ripping, moving, removing, placing or replacing soil or earth, by excavation, or by cutting or filling operations, or by root raking. Earthworks do not include:</p> <p>(a) cultivation of the soil for the establishment of crops or pasture, and</p> <p>(b) the harvesting of crops, and</p> <p>(c) thrusting, boring, trenching or mole ploughing associated with cable or pipe laying and maintenance, and</p> <p>(d) the construction, repair, upgrade or maintenance of:</p> <p>(i) pipelines, and</p> <p>(ii) electricity lines and their support structures, including the National Grid, and</p> <p>(iii) telecommunication structures or lines, and (iv) radio communication structures, and</p> <p>(v) firebreaks or fence lines, and</p> <p>(vi) a bore or geotechnical investigation bore, and (e) repair or maintenance of existing roads and tracks, and airfield runways, taxiways, and parking aprons for aircraft, and</p> <p>(f) maintenance of orchards and shelterbelts, and</p> <p>(g) domestic gardening, and</p>	<p>Requests that the exclusions for infrastructure from the operative NRP are carried over into the relevant rules.</p>		<p>electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S41.001.</p>
	<p>Fulton Hogan Ltd S43.001</p> <p>Opposes the use of different earthworks definitions in different parts of the region. Also proposes deletion of the exemptions currently included in the NRP definition.</p>	<p>Oppose in part</p>	<p>Meridian seeks retention of the exclusions for infrastructure activities. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Disallow the part of S43.001 that seeks deletion of the existing exclusions.</p>
	<p>Akatarawa Valley Residents S120.008 S130.008 S140.008 S121.008 S131.008 S141.008 S122.008 S132.008 S142.008 S123.008 S133.008 S143.008 S124.008 S134.008 S144.008 S125.008 S135.008 S145.008 S126.008 S136.008 S146.008 S127.008 S137.008 S147.008 S128.008 S138.008 S148.008 S129.008 S139.008 S149.008 S150.008 S160.008 S170.008 S161.008 S171.008 S152.008 S162.008 S172.008 S153.008 S163.008 S173.008</p>	<p>Support</p>	<p>The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow the identified submission points S120.008 to S150.008 and S152.008 to S174.008.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
(h) repair, sealing or resealing of a road, footpath, driveway, and (i) discharge of cleanfill material to a cleanfill area	S154.008 S164.008 S174.008 S155.008 S165.008 S156.008 S166.008 S157.008 S167.008 S158.008 S168.008 S159.008 S169.008 Oppose deletion of the exclusions for the named Whaitua.		
	Wellington Water Ltd S151.018 Requests retention of the existing operative plan definition for the whole region (including retention of the exclusions relating to infrastructure activities).	Support in part	Meridian agrees that the removal of the exclusions will result in a large number of consents for minor earthworks activities and will have a significant impact on the ability of infrastructure generally, including regionally significant infrastructure, to repair and maintain networks in a cost effective manner. Meridian considers the listed exclusions should be disjunctive (through use of the expression 'or' instead of 'and' in the list of exclusions); Decision requested: Allow S151.018 in part by retaining the listed exclusions but amend the list by inserting the word 'or' instead of 'and'.
	Transpower NZ Limited S177.009 Seeks amendment to retain the exclusion from the definition of gardening, cultivation, disturbance for the installation of fenceposts and the construction, repair, upgrade or maintenance of electricity lines and their support structures, including the National Grid.	Support in part	The exclusions generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusion for the construction, repair, upgrade or maintenance of electricity lines and their support structures as well as for (c) cable or pipe laying, all of the activities listed in operative exclusion clause (d), (e) existing roads and tracks and (h) roads, footpaths and driveways is also important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
			<p>Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S177.009 in part by retaining all of the listed exclusions but amend the list by inserting the word 'or' instead of 'and'.</p>
	<p>Wairarapa Federated Farmers S193.021</p> <p>Requests retention of the operative definition agreed during mediation of the proposed Natural Resources Plan.</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S193.021.</p>
	<p>Winstone Aggregates S206.023</p> <p>Seeks inclusion of all of the exemptions provided in the existing NRP definition. Notes use of the word 'and' in the list of exclusions implies all exclusions are conjunctive. Seeks replacement of 'and' with 'or'.</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S206.023.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Rosco Ice Cream Ltd S220.002</p> <p>Opposes removal of all reasonable exceptions (other than gardening, cultivation and post holes).</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S220.002.</p>
	<p>Upper Hutt City Council S225.032</p> <p>Seeks reintroduction of all exclusions.</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S225.032.</p>
	<p>Orogen Limited S239.003</p> <p>Opposes the removal of exclusions that apply in other Whaitua and requests reinstatement of exclusions (a) to (i), with a new definition and associated set of rules for the excluded activities.</p>	Support in part	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
			<p>2008. Meridian does not agree that a new definition and associated set of rules is required for the excluded activities;</p> <p>Decision requested: Allow S239.003 in part by reinstating exclusions (a) to (i).</p>
	<p>Best Farm Ltd S254.005</p> <p>Opposes expansion of the definition of 'earthworks' and requests retention of the operative NRP definition.</p>	Support	<p>The excluded activities generally involve minor earthworks extent and do not warrant capture by the proposed PC1 earthworks rules. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S254.005.</p>
	<p>S255.009 Woodridge Holdings Ltd</p> <p>Requests that the definition for all other Whaitua should apply across the entire region.</p>	Support	<p>The operative NRP definition, with including the listed excluded activities, should apply throughout the region. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S255.009.</p>
	<p>Goodman Contractors Limited S274.001</p>	Support	<p>The operative NRP definition, with including the listed excluded activities, should apply throughout the region. Retention of the exclusions is important to enable the development, operation, maintenance and upgrading of</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	Requests retention of the operative definition for the entire region.		equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008; Decision requested: Allow S274.001.
	NZTA S275.003 Considers the definition is very confined and will not allow for the construction, repair, upgrade or maintenance of infrastructure. Requests an exclusion to enable construction, repair, upgrade or maintenance of infrastructure where standards are met.	Support in part	Retention of all of the operative exclusions is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008; Decision requested: Allow S275.003 by reinstating the list of exclusions (a) to (i) from the operative NRP.
	Civil Contractors New Zealand S285.006 Requests reinstatement of the operative NRP definition.	Support in part	Reinstatement of the exclusions in the operative NRP definition is important to enable the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008. Meridian takes no position on amendment relating to cleanfills; Decision requested: Allow S285.006 by reinstating the list of exclusions (a) to (i) from the operative NRP.
Definition of 'Highest erosion risk land (pasture)'			

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<u>Land with highest erosion risk (pasture) in Te Awarua-o-Porirua Whaitua shown on Map 90 or in Whaitua Te Whanganui-a-Tara shown on Map 93.</u>	Horokiwi Quarries Ltd S2.011 Opposes the mapping associated with the definition as it is too high level and has not been substantiated. Requests all mapping is updated with accurate and evidence based mapping or deletion of the definitions (retaining the operative NRP definition of 'erosion prone land'). Also requests that the definition is subject to the Part 1 Schedule 1 process and not the Freshwater Planning Process.	Support in part	Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek; Decision requested: Allow S2.011.
	John Easter S17.002 Opposes the definition and considers potential erosion varies and cannot be determined through aerial scanning data. Considers the mapping is not fit for purpose.	Support	Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek; Decision requested: Allow S17.002.
	Wairarapa Federated Farmers S193.023 Considers the methodology is not fit for purpose and requests deletion of the definition.	Support	Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek; Decision requested: Allow S193.023.
	Winstone Aggregates S206.026 Opposes the mapping associated with the definition as it is too high level and unsubstantiated. Requests deletion of the	Support	Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek; Decision requested: Allow S206.026.

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	definition and retention of the existing NRP definition of 'erosion prone land'. Also requests that this amendment is subject to the Part 1 Schedule 1 process and not a Freshwater Planning Process.		
Definition of 'High erosion risk land (pasture)'			
<u>Land with high erosion risk (pasture) in Te Awarua-o-Porirua Whaitua shown on Map 90 or in Whaitua Te Whanganui-a-Tara shown on Map 93.</u>	<p>John Easter S17.003</p> <p>Opposes the definition and considers potential erosion varies and cannot be determined through aerial scanning data. Considers the mapping is not fit for purpose.</p>	Support	<p>Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;</p> <p>Decision requested: Allow S17.003.</p>
	<p>Wairarapa Federated Farmers S193.024</p> <p>Considers the methodology is not fit for purpose and requests deletion of the definition.</p>	Support	<p>Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;</p> <p>Decision requested: Allow S193.024.</p>
Definition of 'Highest erosion risk land (woody vegetation)'			
<u>Land with highest erosion risk (woody vegetation) in Te Awarua-o-Porirua Whaitua shown on Map 91 or in Whaitua Te Whanganui-a-Tara shown on Map 94.</u>	<p>John Easter S17.004</p> <p>Opposes the definition and considers potential erosion varies and cannot be determined</p>	Support	<p>Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;</p> <p>Decision requested: Allow S17.004.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	through aerial scanning data. Considers the mapping is not fit for purpose.		
	<p>Wairarapa Federated Farmers S193.025</p> <p>Considers the methodology is not fit for purpose and requests deletion of the definition.</p>	Support	<p>Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;</p> <p>Decision requested: Allow S193.025.</p>
	<p>Winstone Aggregates S206.027</p> <p>Opposes the mapping associated with the definition as it is too high level and unsubstantiated. Requests deletion of the definition and retention of the existing NRP definition of 'erosion prone land'. Also requests that this amendment is subject to the Part 1 Schedule 1 process and not a Freshwater Planning Process.</p>	Support	<p>Meridian is concerned about the accuracy of the mapping and its relevance for Meridian's existing wind farms West Wind and Mill Creek;</p> <p>Decision requested: Allow S206.027.</p>
Definition of 'Impervious surfaces'			
<p><u>Surfaces that prevent or significantly impede the infiltration of stormwater into soil or the ground, includes:</u></p> <ul style="list-style-type: none"> • roofs • paved areas (including sealed/compacted metal) such as roads, driveways, parking areas, sidewalks/foot paths or patios, <p><u>and excludes:</u></p>	<p>Transpower NZ Limited S177.012</p> <p>Notes access to National Grid transmission lines and structures in rural areas could lead to a requirement for resource consent for routine reconditioning of existing access tracks and create an impediment to the operation and maintenance of the National Grid. Requests</p>	Support	<p>It appears that the proposed rules applying to 'impervious surfaces' may have been intended to only apply to new greenfield urban development, new roads and new state highways. The only mention of 'impervious surfaces' in the Whaitua policies is in Policy WH.P14 (stormwater from new greenfield (urban) development and existing urban areas). However, proposed Rules WH.R5, WH.R11, and WH.R12, apply to the creation of new impervious surfaces in both rural and urban environments. There is no policy support for applying these rules in rural environments and the definition</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<ul style="list-style-type: none"> • <u>grassed areas, gardens and other vegetated areas</u> • <u>porous or permeable paving</u> • <u>slatted decks which allow water to drain through to a permeable surface</u> • <u>porous or permeable paving and living roofs</u> • <u>roof areas with rainwater collection and reuse</u> • <u>any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)</u> <p>It appears that the intention is that the rules related to 'impervious surfaces' were intended to apply only in the urban or urbanised environment (not the rural environment). However, permitted activity Rule WH.R5 limits the area to 1000m², with a default to Rule Wh.R11 captures the creation of new impervious surfaces in either a rural or urban environment. Which requires consent as a discretionary activity, subject to provision of a Stormwater Impact Assessment with the application. Rule WH.R12 captures the creation of new impervious surfaces in either a rural or urban environment that does not comply with the conditions of Rule WH.R11 (i.e. where no Stormwater Impact Assessment is provided) and requires consent as a non-complying activity.</p>	<p>exclusion of access tracks (including vehicular access tracks).</p>		<p>should make this clear (at least in relation to regionally significant infrastructure, including renewable electricity generation, in rural zones). Exclusion of access tracks (including vehicular access tracks) is important to enable the development, operation, maintenance and upgrading of equipment and facilities (including transmission lines and structures) in rural areas that are necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008. The exclusion should be extended to all paved roads and access tracks associated with regionally significant infrastructure, including renewable electricity generation, in the rural environment;</p> <p>Decision requested: Allow S177.012 and amend the definition as follows:</p> <p>by amending the definition as follows: '...and excludes:</p> <ul style="list-style-type: none"> • grassed areas, gardens and other vegetated areas • <u>access tracks (including vehicular access tracks)</u> • <u>any impervious surface associated with regionally significant infrastructure in a district plan rural zone shown on any district plan map</u> • porous or permeable paving • slatted decks which allow water to drain through to a permeable surface • porous or permeable paving and living roofs • roof areas with rainwater collection and reuse • any impervious surfaces directed to a rain tank utilised for grey water reuse (permanently plumbed)...

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>Similarly, permitted activity Rule P.R5 captures the creation of new impervious surfaces in both rural and urban environments and includes conditions that may not be achievable for large impervious surfaces associated with wind farm access roads or car parking areas. Rule P.R10 is the discretionary activity default where the conditions of Rule P.R5 are not met and requires a Stormwater Impact Assessment. Rule P.R11 is the default non-complying activity rule where no Stormwater Impact Assessment is provided.</p> <p>Note – it may be necessary to refine the exclusion from the definition of ‘impervious surfaces’ IF Meridian accepts that it is reasonable to have a permitted activity covering the standards for discharge from high risk industrial or trade premises (which includes substations and switchyards). Just a complication that I don’t think we need to point out yet – just go for the exclusion solution and refine if possible through the hearing process.</p>	<p>Horokiwi Quarries Ltd S2.012</p> <p>Seeks retention of parts of the definition and an exclusion for impervious surfaces associated with a quarrying activity.</p>	<p>Opposes in part</p>	<p>Meridian is concerned that inclusion of all paved surfaces in the definition (including roads and access tracks integral to or associated with renewable electricity generation facilities in rural areas) will result in unnecessary consent requirements for repair, maintenance and upgrading of paved roads and access tracks within its existing wind farms West Wind and Mill Creek which will not generate the adverse effects of concern under PC1. This will present an unnecessary obstacle to enabling the development, operation, maintenance and upgrading of equipment and facilities necessary for renewable electricity generation activities as intended by the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Electricity Transmission 2008;</p> <p>Decision requested: Allow S2.012 in part by amending the definition as requested for S177.012.</p>
	<p>Wellington City Council S33.012</p> <p>Opposes the definition because it is complex and difficult to implement and because the matter is addressed through District Plans as set out in s. 80E of the Act and 3.5 (4) of the NPS-FM.</p>	<p>Support in part</p>	<p>Meridian’s concerns are as stated for S177.012.</p> <p>Decision requested: Allow S33.012 by deleting the definition or by amending the definition as requested for S177.012.</p>
	<p>Winstone Aggregates S206.028</p> <p>Notes that the intention stated in the s.32 evaluation is to capture urban development and is concerned that would also capture quarrying activities. Seeks retention of parts of the</p>	<p>Oppose in part</p>	<p>Meridian agrees that the PC1 intention appears to have been to only capture urban impervious surfaces. Meridian’s concerns are as stated for S177.012.</p> <p>Decision requested: Allow S206.028 in part by amending the definition as requested for S177.012.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	definition and an exclusion for impervious surfaces associated with a quarrying activity.		
	<p>Guildford Timber Company, Silverstream Forest Limited and Goodwin Estate Trust S210.009</p> <p>Seeks retention of the definition as publicly notified.</p>	Oppose in part	<p>Meridian's concerns are as stated for S177.012.</p> <p>Decision requested: Allow S210.009 in part by amending the definition as requested for S177.012.</p>
	<p>Rosco Ice Cream Ltd S220.005</p> <p>Supports the definition, including the exclusions.</p>	Oppose in part	<p>Meridian's concerns are as stated for S177.012.</p> <p>Decision requested: Allow S220.005 in part by amending the definition as requested for S177.012.</p>
	<p>Kāinga Ora S257.005</p> <p>Seeks retention of publicly notified definition.</p>	Oppose in part	<p>Meridian's concerns are as stated for S177.012.</p> <p>Decision requested: Allow S275.005 in part by amending the definition as requested for S177.012.</p>
	<p>The Fuel Companies S258.003</p> <p>Seeks retention of the publicly notified definition.</p>	Oppose in part	<p>Meridian's concerns are as stated for S177.012.</p> <p>Decision requested: Allow S258.003 in part by amending the definition as requested for S177.012.</p>
<p>Objective O2 The importance and contribution of air, land, water and ecosystems to the social, economic and cultural well-being and health of people and the community are recognised in the management of those resources.</p>	<p>Wellington International Airport Limited S101.018</p> <p>Opposes the exclusion of O2 from Whaitua Te Whanganui-a-Tara.</p>	Support	<p>Objective O2 remains relevant for both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua. The benefits described in Objective O2 include the benefits of regionally significant infrastructure, including renewable electricity generation which are required to be recognised and provided for by the NPS-REG;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]			Decision requested: Allow S101.018 and retain Objective O2 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.
	Wellington Water Ltd S151.031 Considers the benefits should be recognised regardless of location. Requests retention of Objective O2 for all locations.	Support	The benefits described in Objective O2 should be recognised, regardless of location. The benefits described in Objective O2 include the benefits of regionally significant infrastructure, including renewable electricity generation which are required to be recognised and provided for by the NPS-REG. Decision requested: Allow S151.031 and retain Objective O2 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.
	Wairarapa Federated Farmers S193.029 Considers Objective O2 is relevant to all Whaitua. Requests retention of Objective O2 for all Whaitua.	Support	The benefits described in Objective O2 should be recognised, regardless of location. The benefits described in Objective O2 include the benefits of regionally significant infrastructure, including renewable electricity generation which are required to be recognised and provided for by the NPS-REG Decision requested: Allow S193.029 and retain Objective O2 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.
	Civil Contractors NZ S285.012 Considers the benefits should be recognised regardless of location.	Support	The benefits described in Objective O2 should be recognised, regardless of location. The benefits described in Objective O2 include the benefits of regionally significant infrastructure, including renewable electricity generation which are required to be recognised and provided for by the NPS-REG. Decision requested: Allow S285.012 and retain Objective O2 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>Objective O6 The social, economic, cultural and environmental benefits of taking and using water are recognised, when managing water.</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p>Wellington Water Ltd S151.033</p> <p>Considers it is important that the benefits stated in Objective O6 are recognised. Requests retention of Objective O6 in all locations, with amendment to address stormwater management and wastewater disposal.</p>	Support in part	<p>The benefits described in Objective O6 should be recognised, regardless of location. The benefits described in Objective O2 include the benefits of regionally significant infrastructure.</p> <p>Decision requested: Allow S151.033 and retain Objective O6 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.</p>
	<p>Wairarapa Federated Farmers S193.031</p> <p>Considers Objective O6 is relevant to all Whaitua. Requests retention of Objective O6 for all Whaitua.</p>	Support	<p>The benefits described in Objective O6 should be recognised, regardless of location. The benefits described in Objective O6 include the benefits of regionally significant infrastructure;</p> <p>Decision requested: Allow S193.031 and retain Objective O6 as having application in both Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.</p>
<p>Policy P70: Minimising effects of rural land use activities</p> <p>The adverse effects of rural land use activities, including any associated discharge that may enter water, shall be minimised through the use of regulatory and non-regulatory methods that promote, as a minimum, the use of good management practices including:</p> <ul style="list-style-type: none"> (a) rules and methods in the Plan, and (b) development and implementation of farm environment plans, and (c) information gathering, monitoring, assessment and reporting, and (d) integrated catchment management within the Wellington Regional 	<p>Wairarapa Federated Farmers S193.033</p> <p>Considers Policy P70 is relevant to all Whaitua and requests retention for all Whaitua.</p>	Support	<p>Meridian agrees Policy P70 remains relevant for all Whaitua;</p> <p>Decision requested: Allow S193.033.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>Council and with the involvement of mana whenua, territorial authorities, water users, farmers, households, industry, environmental groups and technical experts.</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>			
<p>Policy P77: Improving water quality for contact recreation and Māori customary use</p> <p>The quality of fresh water bodies and coastal water shall be improved to meet, over time and as a minimum, the objectives in Table 3.1, 3.2 and 3.3, including by:</p> <p>(a) improving water quality in all first priority for improvement water bodies for secondary contact with water listed in Schedule H2 (priority water bodies) in accordance with Method M34, and</p> <p>(b) having particular regard to improving water quality in fresh water bodies and coastal water where contact recreation and/or Māori customary use are adversely affected by discharges from stormwater networks, stormwater from a port, or</p>	<p>Wairarapa Federated Farmers S193.035</p> <p>Considers Policy P77 is relevant to all Whaitua and requests retention for all Whaitua.</p>	<p>Support</p>	<p>Meridian agrees Policy P77 remains relevant for all Whaitua;</p> <p>Decision requested: Allow S193.035.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>airport, wastewater networks and wastewater treatment plants.</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>			
<p>Policy P84: Managing land use impacts on stormwater Land use, subdivision and development, including stormwater discharges, shall be managed so that runoff volumes and peak flows:</p> <p>(a) avoid or minimise scour and erosion of stream beds, banks and coastal margins, and</p> <p>(b) do not increase risk to human health or safety, or increase the risk of inundation, erosion or damage to property or infrastructure, including by retaining, as far as practicable, pre-development hydrological conditions in new subdivision and development.</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p>Wellington International Airport Ltd S101.029</p> <p>Opposes the exclusion of Policy P84 from Whaitua Te Whanganui-a-Tara and requests retention in this Whaitua.</p>	Support	<p>Meridian agrees the policy remains relevant for all Whaitua;</p> <p>Decision requested: Allow S101.029 and retain Policy P84 as applicable in all Whaitua.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>Rule R48 Stormwater from an individual property – permitted activity</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p>Wairarapa Federated Farmers S193.038</p> <p>Considers Rule R48 is relevant to all Whaitua and requests retention for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for stormwater management and, if Meridian's submission points are accepted, agrees Rule R48 should be retained (in preference) as relevant for all Whaitua;</p> <p>Decision requested: Allow S193.038.</p>
<p>Rule R55 All other stormwater – discretionary activity</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p>Wellington International Airport Ltd S101.035</p> <p>Requests that, if primary relief on the Chapter 8 provisions is not accepted, Rule R55 should not be excluded from applying in Whaitua Te Whanganui-a-Tara. Requests Rule R55 be retained for Whaitua Te Whanganui-a-Tara.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for stormwater management and, if Meridian's submission points are accepted, agrees Rule R55 should be retained (in preference) as relevant for all Whaitua;</p> <p>Decision requested: Allow S101.035 and retain Rule R55 for all Whaitua.</p>
<p>Rule R101 – Earthworks permitted activity</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p>Wellington International Airport Ltd S101.036</p> <p>Requests that, if primary relief on the Chapter 8 provisions is not accepted, Rule R101 should not be excluded from applying in Whaitua Te Whanganui-a-Tara. Requests Rule R101 be retained for Whaitua Te Whanganui-a-Tara.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for stormwater management and, if Meridian's submission points are accepted, agrees Rule R101 should be retained (in preference) as relevant for all Whaitua;</p> <p>Decision requested: Allow S101.036 and retain Rule R101 for all Whaitua.</p>
	<p>Transpower NZ Limited S177.015</p> <p>Requests that Rule R101 continues to apply in all Whaitua because the proposed Whaitua rules do not provide any permitted activity threshold for earthworks less than 3000m² and R101</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian's submission points are accepted, agrees Rule R101 should remain for all Whaitua;</p> <p>Decision requested: Allow S177.015 and retain Rule R101 for all Whaitua.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	provides reasonable conditions for smaller scale earthworks.		
	<p>Wairarapa Federated Farmers S193.039</p> <p>Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R101 is retained for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian's submission points are accepted, agrees Rule R101 should remain for all Whaitua;</p> <p>Decision requested: Allow S193.039 and retain Rule R101 for all Whaitua.</p>
	<p>Department of Corrections S248.019</p> <p>Requests that Rule R101 continues to apply in all Whaitua because the proposed Whaitua rules do not provide any permitted activity threshold for earthworks less than 3000m² and R101 provides reasonable conditions for smaller scale earthworks.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian's submission points are accepted, agrees Rule R101 should remain for all Whaitua;</p> <p>Decision requested: Allow S248.019 and retain Rule R101 for all Whaitua.</p>
<p>Rule R102 – Construction of a new farm track – permitted activity</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p>Wairarapa Federated Farmers S193.040</p> <p>Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R102 is retained for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian's submission points are accepted, agrees Rule R102 should remain for all Whaitua;</p> <p>Decision requested: Allow S193.040 and retain Rule R102 for all Whaitua.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>Rule R103 – Construction of a new farm track – controlled activity</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p>Wairarapa Federated Farmers S193.041</p> <p>Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R103 is retained for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for earthworks management and, if Meridian’s submission points are accepted, agrees Rule R103 should remain for all Whaitua;</p> <p>Decision requested: Allow S193.041 and retain Rule R103 for all Whaitua.</p>
<p>Rule R104 – Vegetation clearance on erosion prone land – permitted activity</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p>Wairarapa Federated Farmers S193.042</p> <p>Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R104 is retained for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for vegetation clearance and, if Meridian’s submission points are accepted, agrees Rule R104 should remain for all Whaitua;</p> <p>Decision requested: Allow S193.042 and retain Rule R104 for all Whaitua.</p>
<p>Rule R105 – Vegetation clearance on erosion prone land in accordance with a Freshwater Farm Plan – permitted activity</p> <p>[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]</p>	<p>Wairarapa Federated Farmers S193.043</p> <p>Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R105 is retained for all Whaitua.</p>	Support	<p>Meridian opposes aspects of the Whaitua-specific rules for vegetation clearance and, if Meridian’s submission points are accepted, agrees Rule R105 should remain for all Whaitua;</p> <p>Decision requested: Allow S193.043 and retain Rule R105 for all Whaitua.</p>
<p>Rule R106 – Earthworks and vegetation clearance for renewable energy generation – restricted discretionary activity</p>	<p>Taumata Arowai S116.018</p>	Support in part	<p>Meridian agrees amendment to reflect legislative change is appropriate and considers Rule R106 remains relevant for all Whaitua (with the amendment Taumata Arowai proposes);</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
[NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]	Seeks amendment to provisions to reflect legislative changes re what constitutes a drinking water supply.		Decision requested: Allow S116.018 by retaining Rule R106 for all Whaitua, amended as proposed by R116.018.
Rule R107 – Earthworks and vegetation clearance - discretionary activity [NRP PC1 proposes that this provision will not apply in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua]	Wellington International Airport Ltd S101.037 Requests that, if primary relief on the Chapter 8 provisions is not accepted, Rule R107 should not be excluded from applying in Whaitua Te Whanganui-a-Tara. Requests Rule R107 be retained for Whaitua Te Whanganui-a-Tara.	Support	Meridian opposes aspects of the Whaitua-specific rules for earthworks and vegetation clearance and, if Meridian's submission points are accepted, agrees Rule R107 should be retained (in preference) as relevant for all Whaitua; Decision requested: Allow S101.037 and retain Rule R107 for all Whaitua.
	Wairarapa Federated Farmers S193.044 Considers the operative rule agreed in Environment Court mediation should be retained. Requests that Rule R107 is retained for all Whaitua.	Support	Meridian opposes aspects of the Whaitua-specific rules for vegetation clearance and, if Meridian's submission points are accepted, agrees Rule R107 should remain for all Whaitua; Decision requested: Allow S193.044 and retain Rule R107 for all Whaitua.

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
Chapter 8 Proposed Provisions for Whaitua Te Whanganui-a-Tara:			
<p>Objective WH.O1 <u>The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100.</u></p> <p>Note In the wai ora state: <ul style="list-style-type: none"> • <u>Āhua (natural character) is restored and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and character</u> • <u>All freshwater bodies have planted margins</u> • <u>All freshwater bodies and coastal waters have healthy functioning ecosystems and their water conditions and habitat support the presence, abundance, survival and recovery of At-risk and Threatened species and taonga species</u> • <u>Mahinga kai and kaimoana species are healthy, plentiful enough for long term harvest and are safe to harvest and eat or use, including for manuhiri and to exercise manaakitanga</u> • <u>Mana whenua are able to undertake customary practices at a range of places throughout the catchment.</u> </p>	<p>Transpower NZ Ltd S177.018</p> <p>Supports progressive improvement but does not consider restoration of natural character of all freshwater bodies and coastal marine area can be reasonably achieved where there is existing RSI located over or within freshwater bodies or the coastal marine area, if the objective is read as meaning that infrastructure must be removed. Considers the objective should acknowledge complete restoration of character may not be possible in all instances as relates to RSI. Requests insertion of 'Āhua (natural character) is restored to the extent that this is possible,'</p>	Support in part	<p>Meridian agrees the objective should acknowledge lawfully established existing infrastructure and require restoration to the extent that is practicable.</p> <p>Decision requested: Allow S177.018 by inserting the words '...is restored to the extent practicable,'</p>
	<p>Winstone Aggregates S206.032</p> <p>Request amendment:</p> <p>'Objective WH.O1 The health of all freshwater bodies and the coastal marine area within Whaitua Te Whanganui-a-Tara is progressively improved and is wai ora by 2100. Note In the wai ora state: Āhua (natural character) is restored where it has been degraded and freshwater bodies exhibit their natural quality, rhythms, range of flows, form, hydrology and</p>	Support	<p>Meridian agrees the objective should acknowledge lawfully established existing infrastructure and require restoration to the extent that is practicable.</p> <p>Decision requested: Allow S206.032.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>character All-freshwater bodies have planted margins as far as practicable...'</p> <p>Also queries the note and, in particular, whether the expectation that all freshwater bodies have planted margins is possible.</p>		
	<p>Hutt City Council S211.006</p> <p>Supports the long term vision towards full restoration but seeks clarification of whether the note is part of the objective or an advisory note. Considers it is not physically possible for all water bodies to have planted margins, therefore seeks insertion of 'where possible'.</p>	Support in part	<p>Meridian agrees the objective should acknowledge lawfully established existing infrastructure and require restoration to the extent that is practicable.</p> <p>Decision requested: Allow S211.006 by inserting the words '...where practicable,'.</p>
	<p>Environmental Defence Society S222.022</p> <p>Requests deletion of the word 'note' – so that the specifications of what constitutes 'wai ora' is included in the objective. Also seeks amendment of the target date from 2100 to 2050.</p>	Oppose	<p>The shortened time frame is not practicably achievable. If the objective is to specify what constitutes 'wai ora' the wording needs to be refined to reflect practicability particularly where existing infrastructure, including regionally significant infrastructure, means it is not practicable to plant river margins or to completely restore natural character;</p> <p>Decision requested: Disallow S222.022.</p>
	<p>Minister of Conservation S245.001</p> <p>Supports the objective but questions the achievability of having planted margins in all waterbodies. Seeks amendment: "All freshwater bodies have vegetated margins where practicable."</p>	Support	<p>Meridian agrees that there will be situations where planted margins are not achievable (for example, due to the presence of lawfully established infrastructure);</p> <p>Decision requested: Allow S245.001 and clarify whether the note to Objective WH.O1 is intended as an advisory note or as part of the objective.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Kāinga Ora S257.010</p> <p>Supports the proposed objectives but notes that some objectives would be difficult to achieve. Seeks amendment to align with but not go beyond NPS-FM.</p>	Support in part	<p>Meridian agrees that some of the outcomes detailed in the note to the objective will be difficult to achieve;</p> <p>Decision requested: Allow S257.010 in part by inserting 'where practicable' into the first two bullet points and clarifying whether the note to Objective WH.O1 is intended to be an advisory note or part of the objective.</p>
	<p>Forest & Bird S261.049</p> <p>Considers the explanation of 'wai ora' should be part of the objective and that 2100 is too far away. Seeks addition of ephemeral watercourses and deletion of the word 'note'. Also requests amendment of time frame to 2050 or FMU-specific time frames set according to the ease or difficulty of achieving the target attribute states there.</p>	Opposes	<p>The shortened time frame is not practicably achievable. If the objective is to specify what constitutes 'wai ora' the wording needs to be refined to reflect practicability particularly where existing infrastructure, including regionally significant infrastructure, means it is not practicable to plant river margins or the completely restore natural character;</p> <p>Decision requested: Disallow S261.049.</p>
	<p>Taranaki Whānui S286.018</p> <p>Supports full restoration of Te Whanganui-a-Tara's waterways to wai ora. Considers it is unclear if the text of the 'note' forms part of the objective. Requests deletion of the word 'note'.</p>	Oppose in part	<p>Meridian agrees that the purpose of the note should be clarified but also considers that, as worded, some of the outcomes detailed in the note will be difficult to achieve, particularly where lawfully-established infrastructure, including regionally significant infrastructure, is present;</p> <p>Decision requested: Allow S286.018 in part by inserting 'where practicable' into the first two bullet points and clarifying whether the note to Objective WH.O1 is intended to be an advisory note or part of the objective.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>Policy WH.P2 Management of activities to achieve target attribute states and coastal water objectives</u> <u>Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</u></p> <p>(a) <u>prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</u></p> <p>(b) <u>encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</u></p> <p>(c) <u>imposing hydrological controls on urban development and stormwater discharges to rivers</u></p> <p>(d) <u>requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</u></p> <p>(e) <u>stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and</u></p> <p>(f) <u>requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</u></p>	<p>Wairarapa Federated Farmers S193.068</p> <p>Requests deletion of (g) and (h).</p>	Support in part	<p>Meridian opposes any requirement to re-vegetate with woody vegetation any land within its West Wind and Mill Creek wind farms because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S193.068 in part by deleting the reference to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p>Guildford Timber Company, Silverstream Forest Limited and Goodwin Estate Trust S210.025</p> <p>Requests, either, deletion of clause (g) or amendment to read:</p> <p>'(g) <u>adopting best practice principles and management of</u> soil conservation treatment, <u>including revegetation with woody vegetation</u> of land with high erosion risk,'</p>	Support in part	<p>Meridian opposes any requirement to re-vegetate with woody vegetation any land within its West Wind and Mill Creek wind farms because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S210.025 in part by deleting the reference to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p>Environmental Defence Society S222.035</p> <p>Requests amendment of (f) to require avoidance of significant adverse effects from earthworks, forestry and vegetation clearance activities.</p>	Oppose	<p>The amendment is not necessary. Avoidance of significant adverse effects will be a subset of 'active management' of these activities, determined according to the circumstances;</p> <p>Decision requested: Disallow S222.035.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>(g) <u>soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and</u></p> <p>(h) <u>requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</u></p>			
<p><u>Policy WH.P23: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion</u> <u>Reduce discharges of sediment from farming activities on high erosion risk land and highest erosion risk land by:</u></p> <p>(a) <u>identifying highest erosion risk land (pasture) and high erosion risk land (pasture), and</u></p> <p>(b) <u>requiring that farm environment plans prepared for farms with highest erosion risk land (pasture) and/or high erosion risk land (pasture) include an erosion risk treatment plan, and</u></p> <p>(c) <u>ensuring erosion risk treatment plans:</u></p> <p>(i) <u>deliver permanent woody vegetation cover on at least 50% of highest risk erosion land (pasture) that is in pasture on a farm within 10 years and</u></p>	<p>Louise Askin S9.017</p> <p>Considers woody vegetation is only one option for land treatment and is a challenge to establish in exposed Makara/Ohariu areas. Notes Meridian does not allow revegetation with plants over 1m on many ridgelines across several of the largest local farms due to their disruption of wind flow.</p> <p>Considers working alongside Meridian's windfarm an additional challenge where afforestation needs to be designed to not impede wind flow. Opposes clause (c) in particular.</p>	Support	<p>A requirement to establish woody vegetation within existing lawfully established wind farms has the potential to disrupt wind flows, has the potential to impede the maintenance, repair and upgrading of established wind farms and conflicts with the objectives and policies of the NPS-REG;</p> <p>Decision requested: Allow S9.017 and delete clause (c) (i).</p>
	<p>Louise Askin S9.018</p> <p>Concerned that applying the map at property scale will create significant cost to landowners. Considers that on-farm actions need to be based on farm-scale assessment of erosion</p>	Support in part	<p>Consideration of erosion risk from rural land should be based on farm-scale assessment and should include consideration of all of the land use activities present and the impact of mitigation measures on those. For example, the deleterious impact of requiring re-vegetation with woody vegetation on the operation of lawfully established wind farms;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>appropriate erosion control treatment for the remaining highest risk erosion land (pasture) and high erosion risk land (pasture) that is in pasture on the farm, and</u></p> <p>(ii) <u>identify and respond to risks of sediment loss on high erosion risk land (pasture) associated with grazing livestock, earthworks or vegetation clearance, by using effective erosion control treatment, and</u></p> <p>(d) <u>Wellington Regional Council providing support to landowners to implement erosion risk treatment plans.</u></p>	<p>risks. Requests amendment to focus on identify sediment sources rather than solely erosion risk.</p>		<p>Decision requested: Allow S9.018 and replace reference to the mapping of 'highest erosion risk land (pasture)' and 'high erosion risk land (pasture)' with reference to identifying highest erosion risk at a farm scale.</p>
	<p>John Easterher S17.016</p> <p>The mapped erosion areas should be used to how areas which are subject to further investigation and should be labelled indicative to assist with interpretation and not be part of the plan change.</p>	<p>Support in part</p>	<p>Meridian is concerned at the farm-scale accuracy (or inaccuracy) of the mapping and the impact of the rules associated with the mapping;</p> <p>Decision requested: Allow S17.016 and amend the status of the plans to indicative.</p>
	<p>Fenaughty Partnership – Riu Huna Farm S39.015 and S39.017</p> <p>Concerned about the accuracy of the modelled scenarios that might not include accurate analysis of soil types and is at a coarse scale that is not fit for purpose for Makara/Ohariu. Requests removal of the requirement for re-vegetation and, instead, reliance on bespoke actions and timeframes identified through farm-scale assessment. Also concerned about re-vegetation projects alongside Meridian's wind farms because afforestation needs to be designed to not impede wind flow. Requests removal of the blanket approach (to be replaced by bespoke actions and timeframes identified through farm-scale assessment).</p>	<p>Support in part</p>	<p>Meridian also has concerns about the accuracy (or inaccuracy) of the mapping a farm scale and about the impact of the rules associated with the mapping. Meridian agrees that farm-scale assessment should be undertaken, including of mitigation measures to ensure they do not conflict with existing lawfully established activities such as wind farms;</p> <p>Decision requested: Allow S39.015 and s39.017 in part by deleting clause (c) (i).</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Makara and Ohariu large farms S51.009</p> <p>Concerned about potential conflict between re-vegetation with woody vegetation and nearby wind farms. Requests removal of clause (c) (to be replaced by bespoke actions and timeframes identified through farm-scale assessment).</p>	Support in part	<p>Meridian opposes a requirement for re-vegetation with woody vegetation in close proximity to wind turbines where the vegetation could impede wind flow and could become an obstacle to the maintenance, repair and upgrading of lawfully-established wind farms. Meridian agrees that farm-scale assessment should be undertaken, including of mitigation measures to ensure they do not conflict with existing lawfully established activities such as wind farms;</p> <p>Decision requested: Allow S51.009 in part by deleting clause (c) (i).</p>
	<p>Terawhiti Farming Co. Ltd S224.012</p> <p>Concerned about potential conflict between re-vegetation and nearby wind farms. Considers that the modelling is inaccurate and that retirement of farmland should not be required where there are no erosion issue. Requests removal of blanket approach (to be replaced by bespoke actions and timeframes identified through farm-scale assessment).</p>	Support	<p>Meridian opposes a requirement for re-vegetation with woody vegetation in close proximity to wind turbines where the vegetation could impede wind flow and could become an obstacle to the maintenance, repair and upgrading of lawfully-established wind farms. Meridian agrees that farm-scale assessment should be undertaken, including of mitigation measures to ensure they do not conflict with existing lawfully established activities such as wind farms;</p> <p>Decision requested: Allow S224.012 by deleting clause (c) (i).</p>
	<p>Te Kamaru Station Ltd S229.012</p> <p>Concerned about the challenge to re-vegetation working alongside Meridian's wind farms (which cross six of the submitter's farms) where afforestation needs to be designed to not impede wind flow.</p>	Support	<p>Meridian opposes a requirement for re-vegetation with woody vegetation in close proximity to wind turbines where the vegetation could impede wind flow and could become an obstacle to the maintenance, repair and upgrading of lawfully-established wind farms;</p> <p>Decision requested: Allow S229.012 by deleting clause (c) (i).</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Te Marama Ltd S231.012</p> <p>Notes the challenges with the wind farms and revegetation needing not to impede wind flows.</p>	Support	<p>Meridian opposes a requirement for re-vegetation with woody vegetation in close proximity to wind turbines where the vegetation could impede wind flow and could become an obstacle to the maintenance, repair and upgrading of lawfully-established wind farms;</p> <p>Decision requested: Allow S231.012 by deleting clause (c) (i).</p>
<p><u>Policy WH.P31: Winter shut down of earthworks</u> Earthworks over 3,000m² in area shall:</p> <p>(a) <u>be shut down from 1st June to 30th September each year, and</u></p> <p>(b) <u>prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).</u></p>	<p>Horokiwi Quarries Ltd S2.027</p> <p>Opposes Policy WH.P31 in its entirety and requests its deletion.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S2.027 by deleting Policy WH.P31.</p>
	<p>P F Olsen Ltd S18.031</p> <p>Considers the winter shutdown for earthworks will have significant economic burdens for construction projects and requests deletion of the provision.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S18.031 by deleting Policy WH.P31.</p>
	<p>Summerset Group Holdings Ltd S38.010</p> <p>Opposes the requirement to seek a non-complying activity resource consent to undertake winter earthworks and requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S38.010 by deleting Policy WH.P31.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Fulton Hogan Ltd S43.013</p> <p>Considers the policy is onerous and does not recognise that winter earthworks may be feasible depending on other factors. Seeks greater flexibility, provided activities are undertaken in accordance with GWRC ESCP standards and are managed and monitored. Requests amendment by inserting 'unless they can be staged or otherwise undertaken in a manner that avoids adverse effects on water quality'.</p>	Supports and opposes in part	<p>Meridian agrees the blanket approach of the policy is inappropriate, particularly for projects to establish or upgrade regionally significant infrastructure, and considers the policy should be deleted, not amended, because there are other operative policies that already provide for the flexibility proposed by the submitter;</p> <p>Decision requested: Disallow S43.013 by deleting (not amending) Policy WH.P31.</p>
	<p>Wellington International Airport Ltd S101.055</p> <p>Opposes Policy WH.P31 as it does not provide a consent pathway for large scale infrastructure projects. Requests a stand-alone policy and rule for earthworks associated with the airport or regionally significant infrastructure more broadly or deletion of Policy WH.P31 and reversion to the operative NRP provisions.</p>	Support in part	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S101.055 in part by deleting Policy WH.P31, or by amending the policy to exclude earthworks for the purpose of regionally significant infrastructure.</p>
	<p>Gillies Group Management Ltd S161.015</p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S161.015 by deleting Policy WH.P31.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Pukerua Holdings Limited S165.015</p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S165.015 by deleting Policy WH.P31.</p>
	<p>Koru Homes NZ Limited S169.010</p> <p>Opposes non-complying activity status for winter earthworks and notes that large rain events at any time can cause larger pulses of sediment. The current practice for managing winter earthworks with GWRC oversight is sufficient. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S169.010 by deleting Policy WH.P31.</p>
	<p>Arakura Plains Development Limited S173.015</p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S173.015 by deleting Policy WH.P31.</p>
	<p>Transpower NZ Limited S177.027</p> <p>Considers the policy is inappropriate as it does not recognise there may be circumstances where earthworks need to occur in order to</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S177.027 by deleting Policy WH.P31.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	provide for safe and efficient operation, maintenance, upgrading or development of regionally significant infrastructure. Requests deletion of Policy WH.P31.		
	<p>Wairarapa Federated Farmers S193.091</p> <p>Considers the issue is addressed by existing NRP provisions and requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S193.091 by deleting Policy WH.P31.</p>
	<p>Hutt City Council S211.017</p> <p>Disagrees with the s. 32 evaluation that there is a higher risk of sediment discharge during winter. Large storm events can occur throughout the year. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S211.017 by deleting Policy WH.P31.</p>
	<p>RP Mansell, J Mansell & MR Mansell S217.006</p> <p>Considers the proposed winter shut down is onerous and unnecessary in light of the other provisions. Notes that high rainfall events can occur during any time of year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S217.006 by deleting Policy WH.P31.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Cuttriss Consultants Ltd S219.012</p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S219.012 by deleting Policy WH.P31.</p>
	<p>Upper Hutt City Council S225.093</p> <p>Concerned the policy reads more like a rule or standard. Requests delete the policy or amend to be a policy rather than a rule or standard.</p>	Support and oppose in part	<p>Meridian opposes the provision as either a policy or a standard or rule;</p> <p>Decision requested: Allow S225.093 by deleting Policy WH.P31.</p>
	<p>Orogen Limited S239.004</p> <p>Does not support earthworks during the period 1st June to 30th September being a non-complying activity, however acknowledges that seasonal variations in rainfall and groundwater should be taken into consideration.</p>	Support and oppose in part	<p>Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;</p> <p>Decision requested: Allow S239.004 in part by deleting Policy WH.P31.</p>
	<p>Pukerua Property Group Ltd S241.014</p> <p>Considers the policy is too blunt. Requests withdrawal of PC1 or deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S241.014 by deleting Policy WH.P31.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Land Matters Limited S243.019</p> <p>Considers the policy is too blunt. Requests deletion of Policy WH.P31 or amendment to provide for winter works subject to criteria.</p>	Support and oppose in part	<p>Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;</p> <p>Decision requested: Allow S243.019 in part by deleting Policy WH.P31.</p>
	<p>Carrus Corporation Ltd S247.012</p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S247.012 by deleting Policy WH.P31.</p>
	<p>Department of Corrections S248.028</p> <p>Considers the policy is inappropriate, there are instances where earthworks are unavoidable at this time and, with careful management, can be undertaken in a manner that avoids, remedies, or mitigates adverse effects. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S248.028 by deleting Policy WH.P31.</p>
	<p>Thames Pacific S252.012</p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy WH.P31.		Decision requested: Allow S252.012 by deleting Policy WH.P31.
	<p>Woodridge Holdings Ltd S255.031</p> <p>Considers the policy is not effects based as not every earthworks project over 3000m² will have adverse effects at this time. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S255.031 by deleting Policy WH.P31.</p>
	<p>Kāinga Ora S257.026</p> <p>Opposes Policy WH.P31 and the non-complying rule framework. Considers winter works can be adequately considered as a listed discretionary matter within a RDA rule. Requests deletion of Policy WH.P31 and consequential changes to WH.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S257.026 by deleting Policy WH.P31.</p>
	<p>Cannon Point Development Ltd S260.007</p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S260.007 by deleting Policy WH.P31.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	justify why this measure is required. Requests deletion of Policy WH.P31.		
	<p>NZTA S275.037</p> <p>Prohibiting earthworks during the winter period would impose significant constraints on NZTA's essential works construction programme. Requests removal of the winter works control, or provision for a process for winter works approval without the need for consent.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S275.037 by deleting Policy WH.P31.</p>
	<p>Taranaki Whānui S286.062</p> <p>Considers winter earthworks can be addressed through consent conditions rather than requiring a separate consent. Requests deletion of Policy WH.P31.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S286.062 by deleting Policy WH.P31.</p>
Rules for the Whaitua Te Whanganui-a-Tara:			
<p><u>Rule WH.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity</u> <u>The discharge of stormwater from an existing high risk industrial or trade premise, that is not a port or airport, into water, or onto or into land where it may enter water, including via an existing local authority stormwater network, is a</u></p>	<p>Transpower NZ Ltd S177.031</p> <p>Considers the limitation to existing facilities would result in new substations or switchyards being a discretionary activity. Requests deletion of 'existing'. Also requests deletion of 'contaminants' so that the focus is on hazardous substances stored or used on site.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S177.031.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>permitted activity, provided the following conditions are met:</u></p> <p>(a) <u>the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and</u></p> <p>(b) <u>the discharge does not contain wastewater, and</u></p> <p>(c) <u>if the discharge is to land where it may enter groundwater,</u></p> <p>(i) <u>the discharge cannot cause or exacerbate the flooding of any other property, and</u></p> <p>(ii) <u>the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and</u></p> <p>(d) <u>any contaminants stored or used on site, or hazardous substances, cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or</u></p> <p>(i) <u>there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or</u></p> <p>(ii) <u>the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is</u></p>	<p>Firth Industries Limited S207.014</p> <p>Considers there will be no difference in effects associated with stormwater discharge from existing or new such premises and both should be provided for. Requests deletion of 'existing' and deletion of 'contaminants' to focus on hazardous substances.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S207.014.</p>
	<p>Department of Corrections S248.031</p> <p>Considers there will be no difference in effects associated with stormwater discharge from existing or new such premises and both should be provided for. Requests deletion of 'existing' and deletion of 'contaminants' to focus on hazardous substances.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S248.031.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and</u></p> <p>(e) <u>if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed:</u></p> <p>(i) <u>50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or</u></p> <p>(ii) <u>100g/m3 where the discharge enters any other water,</u></p> <p><u>and where the discharge is not via an existing local authority stormwater network the discharge shall also not:</u></p> <p>(f) <u>cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and</u></p> <p>(g) <u>give rise to the following effects beyond the zone of reasonable mixing:</u></p>			

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>(i) <u>the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or</u></p> <p>(ii) <u>any conspicuous change in the colour, or</u></p> <p>(iii) <u>a decrease in water clarity of more than</u></p> <p>1. <u>20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes),</u> <u>or</u></p> <p>2. <u>30% in any other river, or</u></p> <p>(iv) <u>any emission of objectionable odour, or</u></p> <p>(v) <u>the freshwater is unsuitable for consumption by farm animals,</u> <u>or</u></p> <p>(vi) <u>any significant adverse effects on aquatic life.</u></p> <p><u>Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to WH.R11</u></p>			

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>Rule WH.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity</u> <u>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met:</u></p> <p>(a) <u>the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m² (baseline property existing impervious area as at 30 October 2023) and</u></p> <p>(b) <u>all new building materials associated with the development shall not include exposed zinc (including galvanised steel) or copper roof cladding and spouting materials, and</u></p> <p>(c) <u>the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water</u></p>	<p>Wellington City Council S33.060</p> <p>Considers the consenting framework duplicates consenting requirements. Requests deletion of Rule WH.R5 or amendment to limit its applicability to development that is not connected to local authority stormwater networks.</p>	Support in part	<p>It is apparent from the PC1 policies that this and related rules were intended to focus on the urban environment. The reference in Rule WH.R5 to ‘new’ impervious surfaces captures new paved and sealed surfaces in the rural environment. Meridian reiterates the concerns expressed about the definition of ‘impervious surfaces’ and the application of the rules to impervious surfaces in rural environments. The water quality standards are appropriate but the 1000m² area limit is not relevant for regionally significant infrastructure projects on large sites (such as wind farms) in the rural environment;</p> <p>Decision requested: Allow S33.060 in part by limiting the applicability of the rule to development located in urban environments or deleting the 1000m² area limit and/or amending the definition of ‘impervious surfaces’ so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand S41.003</p> <p>Requests an exclusion for new and upgraded telecommunications facilities.</p>	Support	<p>Meridian agrees the rule is not relevant for telecommunications infrastructure and considers the exclusion should also be for all regionally significant infrastructure located in any rural zone. Meridian reiterates the concerns expressed about the definition of ‘impervious surfaces’ and the application of the rules to impervious surfaces in rural environments. The water quality standards are appropriate but the 1000m² area limit is not relevant for regionally significant infrastructure projects on large sites (such as wind farms) in the rural environment;</p> <p>Decision requested: Allow S41.003 by excluding new and upgraded telecommunications facilities and regionally</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>body (including via an existing local authority stormwater network):</u></p> <p>(i) <u>for all impervious areas associated with a greenfield development, or</u></p> <p>(ii) <u>for all redeveloped and new impervious areas involving greater than 30m² of impervious area of a redevelopment (of an existing urbanised property), and</u></p> <p>(d) <u>the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and</u></p> <p>(e) <u>the discharge does not contain wastewater, and</u></p> <p>(f) <u>the concentration of total suspended solids in the discharge shall not exceed:</u></p> <p>(i) <u>50g/m³ where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or</u></p> <p>(ii) <u>100g/m³ where the discharge enters any other water, and</u></p>			significant infrastructure in any rural zone as well as telecommunications facilities and by limiting the applicability of the rule to development located in urban environments or deleting the 1000m ² area limit and/or amending the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.
	<p>Transpower NZ Ltd S177.032</p> <p>Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activities under Rules WH.R5, WH.R6 and WH.R7 subject to appropriate conditions. Notes that Rule WH.R11 captures new impervious surfaces at high risk industrial or trade premises (and therefore seeks inclusion of these in Rule WH.R11).</p>	Support in part	Meridian agrees that there should be permitted activity provision for high risk industrial or trade premises, if these are to be addressed as a separate category of activity distinct from or a subset of regionally significant infrastructure (and Meridian notes that these are present within parts of its existing wind farms). Meridian opposes reliance on discretionary activity Rule WH.R11 for discharges from high risk industrial or trade premises because permitted activity standards can be set for these. The area limit of 1000m ² on a per property per 12 month period basis is not relevant for large scale regionally significant infrastructure in the rural environment;
	<p>Firth Industries Limited S207.015</p> <p>Considers new or redeveloped impervious surfaces for high risk industrial or trade premises should be provided for in this permitted activity rule. Requests amendment to delete the exclusion if high risk industrial or trade premises.</p>	Support in part	Meridian agrees that there should be permitted activity provision for high risk industrial or trade premises, if these are to be addressed as a separate category of activity distinct from or a subset of regionally significant infrastructure (and Meridian notes that these are present within parts of its existing wind farms). Meridian opposes reliance on discretionary activity Rule WH.R11 for discharges from high risk industrial or trade premises because permitted activity standards can be set for these. The area limit of 1000m ² on a per property per 12

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>where the discharge is not via an existing or new local authority stormwater network:</u></p> <p>(g) <u>the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and</u></p> <p>(h) <u>the discharge shall not give rise to the following effects beyond the zone of reasonable mixing:</u></p> <p>(i) <u>the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (</u></p> <p>(ii) <u>any conspicuous change in the colour, or</u></p> <p>(iii) <u>a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or</u></p> <p>(iv) <u>any emission of objectionable odour, or</u></p> <p>(v) <u>the freshwater is unsuitable for consumption by farm animals, or</u></p> <p>(vi) <u>any significant adverse effects on aquatic life.</u></p>			<p>month period basis is not relevant for large scale regionally significant infrastructure in the rural environment;</p> <p>Decision requested: Allow S207.015 but delete the proposed area limit of 1000m² per property in any consecutive 12-month period.</p>
	<p>Guildford Timber Company Ltd, Silverstream Forest Ltd & Goodwin Estate Trust S210.040</p> <p>Opposes the basis for defining the area limit and requests amendment to specify it should apply to an existing or future subdivided lot over a 12 month period.</p>	Oppose	<p>Meridian opposes the 1000m² area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Therefore, Meridian opposes the requested amendment that includes the proposed 1000m² limit;</p> <p>Decision requested: Disallow the amendment requested by S210.040 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m² area limit and/or amend the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p>RP Mansell, AJ Mansell and MR Mansell S217.007</p> <p>Requests amendment to the area limit to apply to an existing or future subdivided lot over a 12 month period.</p>	Oppose	<p>Meridian opposes the 1000m² area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Therefore, Meridian opposes the requested amendment that includes the proposed 1000m² limit;</p> <p>Decision requested: Disallow the amendment requested by S217.007 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m² area limit and/or amend the definition of 'impervious surfaces' so that it</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>Note Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator.</u></p>			applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.
	<p>Upper Hutt City Council S225.098</p> <p>Considers the 1000m² area limit is small and overly onerous in relation to the Council's routine road maintenance and renewal activities. Requests deletion of the 1000m² limit as relates to roads, footpaths/cycleways and driveways.</p>	Support	<p>Meridian agrees the area limit is not relevant, and is onerous, for essential services such as roads, footpaths, driveways and for car parking areas and other large paved areas that are necessary for regionally significant infrastructure;</p> <p>Decision requested: Allow S225.098.</p>
	<p>Higgins Contractors Limited S226.012</p> <p>Concerned that the 1000m² area limit is insufficient and requests an increase (and discusses either a 3000m² or % of site size limit).</p>	Oppose in part	<p>Meridian considers the area limit is not relevant, and is onerous, for essential services such as roads, footpaths, driveways and for car parking areas and other large paved areas that are necessary for regionally significant infrastructure. Meridian considers that the area limit should be deleted, not amended, for these infrastructure activities;</p> <p>Decision requested: Allow S226.012 only to the extent that it does not conflict with Meridian's requested relief to delete the area limit in relation to large paved areas that are essential for regionally significant infrastructure in the rural environment.</p>
<p>Department of Corrections S248.032</p> <p>Considers high risk industrial or trade premises should be provided for as permitted activities under Rule WH.R5. Requests deletion of 'high risk industrial or trade premise'.</p>	Support in part	<p>Meridian agrees that there should be permitted activity provision for high risk industrial or trade premises, if these are to be addressed as a separate category of activity distinct from or a subset of regionally significant infrastructure (and Meridian notes that these are present within parts of its existing wind farms). Meridian opposes reliance on discretionary activity Rule WH.R11 for discharges from high risk industrial or trade premises because permitted activity standards can be set for</p>	

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
			<p>these. The area limit of 1000m² on a per property per 12 month period basis is not relevant for large scale regionally significant infrastructure in the rural environment;</p> <p>Decision requested: Support S248.032 but delete the proposed area limit of 1000m² per property in any consecutive 12-month period.</p>
	<p>Kāinga Ora S257.028</p> <p>Opposes the 1000m² area limit because it will impose a considerable regulatory burden and cost not adequately assessed within the s. 32 analysis. Requests the 1000m² limit is increased to 5000m².</p>	Oppose in part	<p>Meridian opposes the 1000m² area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Meridian considers the limit is not relevant for, and should be deleted, for these activities;</p> <p>Decision requested: Disallow the amendment requested by S257.028 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m² area limit and/or amend the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p>Isla Walker S259.002</p> <p>Objects to Rule WH.R5, specifically the area limit. Requests an increase in the area.</p>	Oppose in part	<p>Meridian opposes the 1000m² area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Meridian considers the limit is not relevant for, and should be deleted, for these activities;</p> <p>Decision requested: Disallow the amendment requested by S259.002 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m² area limit</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
			and/or amend the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.
	Forest & Bird S261.099 Considers greater Council oversight is required. Requests reclassification of activity status to controlled activity.	Oppose	Meridian considers permitted activity for discharges from high risk industrial and trade premises is appropriate and can be managed through conditions in the rule (noting that Meridian opposes the 1000m ² area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment); Decision requested: Disallow S261.099.
	China Forest Group Company NZ Ltd S288.063 Considers there is confusion between definitions and their application. Requests clarification that the rule applies to urban and industrial or similar circumstances.	Support	Meridian agrees there is confusion in the provisions (in the policies and in the rules) and requests amendments to the definition of 'impervious surfaces' to exclude regionally significant infrastructure in the rural environment or to limit the applicability of the rule to urban situations or high risk industrial or trade premises; Decision requested: Allow S288.063.
<u>Rule WH.R11: Stormwater from new and redeveloped impervious surfaces – discretionary activity</u> <u>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may</u>	Wellington City Council S33.065 Considers the proposed framework will result in consenting overlap with WCC functions. Request deletion of Rule WH.R11.	Support in part	Meridian considers the rule should not apply to regionally significant infrastructure in the rural environment; Decision requested: Allow S33.065.
	Transpower NZ Ltd S177.035	Support in part	Meridian agrees that discharges from high risk industrial or trade premises should be provided for as permitted activities subject to conditions. Meridian does not consider Rules

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are met:</u></p> <p>(a) <u>the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and</u></p> <p>(b) <u>if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).</u></p>	<p>Considers high risk industrial or trade premises should be provided for as permitted activities. Opposes and seeks deletion of mandatory financial contributions.</p>		<p>WH.R5 and WH.R11 should apply to regionally significant infrastructure in rural environments;</p> <p>Decision requested: Allow S177.035 in part by amending Rule WH.R11 as follows:</p> <p>‘The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that does not comply with the conditions of is not permitted by Rules WH.R2, WH.R3, WH.R4 or WH.R5, or is not authorised by a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are is met...’.</p>
	<p>Higgins Contractors Limited S226.015</p> <p>Considers the requirement of a full stormwater impact assessment is too onerous for sites greater than 1000m2 in non-urban environments. Requests a new rule to provide for discharges from new or impervious areas other than in urbanised areas as a controlled or restricted discretionary activity, without the requirement to prepare a stormwater impact assessment.</p>	Oppose	<p>Meridian’s opposition is to the extent that such a new rule would require consents for discharges from impervious surfaces associated with regionally significant infrastructure in rural locations;</p> <p>Decision requested: Disallow S226.015 or amend the relief requested to provide for discharges from regionally significant infrastructure in rural environments as permitted activities.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Department of Corrections S248.035</p> <p>Considers high risk industrial or trade premises should be provided for as permitted activities. Opposes and seeks deletion of mandatory financial contributions.</p>	Support in part	<p>Meridian agrees that discharges from high risk industrial or trade premises should be provided for as permitted activities subject to conditions. Meridian does not consider Rules WH.R5 and WH.R11 should apply to regionally significant infrastructure in rural environments;</p> <p>Decision requested: Allow S248.035 in part by amending Rule WH.R11 as follows:</p> <p>'The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that does not comply with the conditions of is not permitted by Rule Rules WH.R2, WH.R3, WH.R4 or WH.R5, or is not authorised by a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are is met...'</p>
	<p>The Fuel Companies S258.021</p> <p>Considers the discretionary activity provisions is appropriate subject to amendment to provide for source control and/or contaminant management.</p>	Oppose	<p>Meridian considers that discharges from high risk industrial or trade premises should be provided for as permitted activities subject to conditions. Meridian does not consider Rules WH.R5 and WH.R11 should apply to regionally significant infrastructure in rural environments;</p> <p>Decision requested: Disallow S258.021 and amend Rule WH.R11 as follows:</p> <p>'The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
			and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that does not comply with the conditions of is not permitted by Rule Rules WH.R2, WH.R3, WH.R4 or WH.R5, or is not authorised by a controlled activity under Rule WH.R6 or Rule WH.R7, or prohibited under WH.R13 is a discretionary activity provided the following conditions are is met...’.
<p><u>Rule WH.R12: All other stormwater discharges – non-complying activity</u> <u>The:</u></p> <p>(a) <u>discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule WH.R2, or</u></p> <p>(b) <u>discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule WH.R3, or a restricted discretionary activity under Rules WH.R8 or WH.R9, or</u></p> <p>(c) <u>discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule WH.R4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade</u></p>	<p>Transpower NZ Ltd S177.036</p> <p>Considers the move to non-complying activity status, for minor breaches of rule conditions, is not sufficiently justified in the s. 32 report. Requests amendment to discretionary activity.</p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Allow S177.036.</p>
	<p><u>Guildford Timber Company, Silverstream Forest Limited and Goodwin Estate Trust S210.043</u></p> <p>Considers the move to non-complying activity status, for minor breaches of rule conditions, is not sufficiently justified in the s. 32 report. Requests amendment to discretionary activity and deletion of reference to Rule WH.R13.</p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Allow S210.043.</p>
	<p><u>RP Mansell, AJ Mansell & MR Mansell S217.010</u></p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
(d) <u>premise that does not meet the conditions of Rule WH.R11, or use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule WH.R5, or a controlled activity under Rule WH.R6 or WH.R7, or a discretionary activity under Rule WH.R10 or WH.R11, or a prohibited activity under WH.R13, is a non-complying activity.</u>	Considers discretionary activity status is more appropriate and requests retention of existing (operative NRP) effects management approach for managing stormwater discharges. Requests amendment to discretionary activity status.		Decision requested: Allow S217.010.
	Department of Corrections S248.036 Considers discretionary activity status is more appropriate and requests retention of existing (operative NRP) effects management approach for managing stormwater discharges. Requests amendment to discretionary activity status.	Support	Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions; Decision requested: Allow S248.036.
	Forest & Bird S261.105 Supports Rule WH.R12 and requests retention as notified.	Oppose	Meridian considers the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions; Decision requested: Disallow S261.105.
	KiwiRail Holdings Ltd S279.007 Supports Rule WH.R12 and requests retention as notified.	Oppose	Meridian considers the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions; Decision requested: Disallow S279.007
<u>Rule WH.R17: Vegetation clearance on highest erosion risk land – permitted activity</u> <u>Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a</u>	Horokiwi Quarries Ltd S2.034 Considers the rule is limiting because it does not allow for any vegetation clearance of the specified land for most uses. Would prefer	Support in part	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>surface water body is a permitted activity provided the following conditions are met:</u></p> <p>(a) <u>the vegetation clearance is:</u></p> <p>(i) <u>to implement an action in the erosion risk treatment plan for the farm, or</u></p> <p>(ii) <u>for the control of pest plants, and</u></p> <p>(b) <u>debris from the vegetation clearance is not placed where it can enter a surface water body.</u></p>	<p>retention of the operative NRP rules. Requests provision for up to 200m² vegetation clearance in any consecutive 12 month period.</p>		<p>submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S2.034 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p>Transpower NZ Ltd S177.038</p> <p>Notes regular vegetation clearance is required to prevent vegetation encroaching on National Grid transmission lines and structures. Requests addition of a clause permitting vegetation clearance of up to 200 m² in any consecutive 12 month period or for the purpose of operating or maintaining the National Grid.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S177.038 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p>Wairarapa Federated Farmers S193.094</p> <p>Requests deletion of Rule WH.R17.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
			<p>of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S193.094 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p>Winstone Aggregates S206.056</p> <p>Considers the rule is limiting because it does not allow for vegetation clearance of the specified land for most uses. Considers the existing approach of operative NRP Rules R104 to R107 is more fit for purpose. Requests addition of a clause permitting vegetation clearance of up to 200 m² in any consecutive 12 month period.</p>	<p>Support in part</p>	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S206.056 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>EDS S222.057</p> <p>Requests the rule be made a controlled activity, or amend the standards to avoid sedimentation of receiving waterbodies and the coastal marine area.</p>	Oppose	<p>Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), considers permitted activity status is appropriate. Meridian also considers the limits in operative Rule R104 or an area limit for regionally significant infrastructure consistent with the limits in Rule R104 is appropriate;</p> <p>Decision requested: Disallow S222.057.</p>
	<p>Kāinga Ora S257.034</p> <p>Generally supports the intent of the rule but seeks a threshold for (other) vegetation clearance as a permitted activity.</p>	Support	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S257.034 by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
			permitted to be cleared to be consistent with operative Rule R104.
	<p>Cannon Point Development Ltd S260.013</p> <p>Considers requiring consent as a discretionary activity for vegetation clearance of areas less than 200m² is onerous and unnecessary. Requests provision for vegetation clearance for other purposes up to 200m² in any consecutive 12 month period and for track maintenance.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S260.013 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p>Forest & Bird S261.110</p> <p>Considers additional standards are required, including area limit of 200m² and minimum setback from water bodies.</p>	Oppose in part	<p>For the reasons explained above, Meridian considers the area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP;</p> <p>Decision requested: Disallow S261.110.</p>
	<p>NZTA S275.027</p> <p>Notes that there is a need to remove vegetation to provide a safe network. The requirement to</p>	Support	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule WH.R17 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	obtain consent is overly onerous. Considers there should be permitted activity provision and a restricted discretionary activity default.		<p>of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S275.027 by providing for vegetation clearance other than for the limited purposes currently listed in Rule WH.R17 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p>Taranaki Whānui S286.081</p> <p>Supports and requests retention as notified.</p>	Oppose	<p>For the reasons explained above, Meridian considers the area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP;</p> <p>Decision requested: Disallow S286.081.</p>
<p><u>Rule WH.R18: Vegetation clearance on highest erosion risk land – controlled activity</u></p> <p><u>Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200m² per property in any consecutive 12-month period, and any associated discharge of sediment to a surface water body is a controlled activity provided an erosion and sediment management plan has been prepared in accordance with Schedule 33 (vegetation clearance plan) and submitted with the</u></p>	<p>Transpower NZ Ltd S177.039</p> <p>Notes that NESETA would prevail. Requests amendment to insert a matter of control addressing clearance from the National Grid.</p>	Oppose in part	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP. This would necessitate a consequential change to the threshold area specified in Rule WH.R18;</p> <p>Decision requested: Allow S177.039 only to the extent consistent with Meridian’s requested relief on Rule WH.R17 and amend the area limit to match the area limit of Rule WH.R17 (being the area limit of operative Rule R104), particular for regionally significant infrastructure.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>application for resource consent under this Rule.</u></p> <p><u>Matters of control</u></p> <p><u>1. The content of the erosion and sediment management plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will not exceed that which occurred from the land prior to the vegetation clearance occurring</u></p> <p><u>2. The area, location and method of vegetation clearance</u></p> <p><u>3. Stabilisation and rehabilitation of the area cleared</u></p> <p><u>4. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan</u></p> <p><u>5. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan</u></p> <p><u>6. The time and circumstances under which the resource consent conditions may be reviewed</u></p>	<p>Wairarapa Federated Farmers S193.095</p> <p>Requests retention of operative NRP rule and deletion of Rule WH.R18.</p>	Support in part	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate amendment of the threshold area specified in Rule WH.R18;</p> <p>Decision requested: Allow S193.095 by amending Rule WH.R17 to match the limits in operative NRP Rule R104 and make consequential amendments to Rule WH.R18.</p>
	<p>Winstone Aggregates S206.057</p> <p>Opposes the mapping but supports the rule and requests its retention.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit (in Rule WH.R17) should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of Rule WH.R18;</p> <p>Decision requested: Disallow S206.057.</p>
	<p>EDS S222.058</p> <p>Requests making the provision for vegetation clearance greater than 200m² a restricted discretionary or discretionary activity rule.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of Rule WH.R18. Meridian considers the controlled activity default provision is appropriate;</p> <p>Decision requested: Disallow S222.058, allow general vegetation clearance as a permitted activity with limits matching those in operative Rule R104 and make consequential amendments to Rule WH.R18 to increase the threshold area to match Rule WH.R17.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Kāinga Ora S257.035</p> <p>Supports the intent of the rule but considers the 200m² threshold too onerous. Requests increasing the area limit before consent is required as a controlled activity</p>	Support and oppose in part	<p>Meridian notes that there is no permitted activity rule currently providing for vegetation clearance for purposes other than those listed in Rule WH.R17. this means that vegetation clearance up to 200m² for other purposes requires consent as a discretionary activity. Meridian agrees the 200m² limit is unduly onerous and considers it should be increased, particularly for vegetation clearance associated with regionally significant infrastructure, as a permitted activity and that the area should match the area limit of operative NRP Rule R104. Meridian supports the proposed controlled activity provision for vegetation clearance of areas greater than the permitted activity limit (provide the permitted activity limit is increased to match Rule R104).</p> <p>Decision requested: Allow S257.035 by increasing the permitted activity Rule WH.R17 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule WH.R18 to reflect this.</p>
	<p>Forest & Bird S261.111</p> <p>Considers the inability to refuse consent is inappropriate. Requests amendment to discretionary activity or restricted discretionary activity with 'adverse effects on the environment' as a matter of discretion.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit is too small and should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. Meridian opposes a discretionary activity default approach where the threshold area is currently so small.</p> <p>Decision requested: Disallow S261.111.</p>
	<p>NZTA S275.028</p>	Support in part	<p>Meridian agrees that permitted activity provision should be made for purposes other than those currently listed in Rule WH.R17. The permitted activity rule should provide for</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	Suggests a permitted activity status for vegetation clearance to provide for a safe transport network, subject to performance standards.		<p>vegetation clearance associated with regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;</p> <p>Requested decision: Allow S275.028 by increasing the permitted activity Rule WH.R17 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule WH.R18 to reflect this.</p>
	<p>KiwiRail Holdings Ltd S279.008</p> <p>Supports the intent of the rule and requests retention as notified.</p>	Oppose	<p>Meridian considers that permitted activity provision should be made for purposes other than those currently listed in Rule WH.R17. The permitted activity rule should provide for vegetation clearance for all regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;</p> <p>Requested decision: Disallow S279.008.</p>
	<p>Taranaki Whānui S286.082</p> <p>Supports the intent of the rule and requests retention as notified.</p>	Oppose	<p>Meridian considers that permitted activity provision should be made for purposes other than those currently listed in Rule WH.R17. The permitted activity rule should provide for vegetation clearance associated with regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds;</p> <p>Requested decision: Disallow S286.082.</p>
<u>Rule WH.R19: Vegetation clearance – discretionary activity</u>	Wairarapa Federated Farmers S193.096	Support	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<u>Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body that does not comply with one or more of the conditions of Rule WH.R17 or Rule WH.R18 is a discretionary activity.</u>	Requests retention of operative NRP rule and deletion of Rule WH.R19.		Decision requested: Allow S193.096.
	Guildford Timber Company Ltd, Silverstream Forest Ltd and the Goodwin Estate Trust S210.047 Supports Rule WH.R19 and requests its retention as notified.	Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals; Decision requested: Disallow S210.047 and reinstate operative NRP Rule R106.
	Forest & Bird S261.112 Supports Rule WH.R19 and requests retention as notified.	Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals; Decision requested: Disallow S261.112 and reinstate operative NRP Rule R106.
	KiwiRail Holdings Ltd S279.009 Supports the intent of Rule WH.R19 and requests retention as notified.	Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals; Decision requested: Disallow S279.009 and reinstate operative NRP Rule R106.
	Taranaki Whānui S286.083 Supports Rule WH.R19 in principle and requests retention as notified.	Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals; Decision requested: Disallow S286.083 and reinstate operative NRP Rule R106.

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>Rule WH.R23: Earthworks – permitted activity Earthworks is a permitted activity, provided the following conditions are met:</p> <p>(a) <u>the earthworks are to implement an action in the erosion risk treatment plan for the farm, or</u></p> <p>(b) <u>the earthworks are to implement an action in the farm environment plan for the farm, or</u></p> <p>(c) <u>the area of earthworks does not exceed 3,000m² per property in any consecutive 12-month period, and</u></p> <p>(d) <u>the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124, R130, R131, R134, R135, and R137, and</u></p> <p>(e) <u>soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and</u></p> <p>(f) <u>the area of earthworks must be stabilised within six months after completion of the earthworks, and</u></p> <p>(g) <u>there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body</u></p>	<p>Horokiwi Quarries Ltd S2.037</p> <p>Considers the rule should include associated discharges and opposes the inclusion of the restriction in (g) which prevents even minor discharges. Requests amendment to insert associated discharges and delete (g).</p>	Support	<p>Meridian agrees that the chapeau of the rule needs to provide for associated discharges (including discharges of sediment and/or flocculant) and considers that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S2.037.</p>
	<p>Wellington City Council S33.071</p> <p>Considers clause (g) cannot be met. Requests deletion of (g) and insertion of threshold area for erosion and sediment control measures.</p>	Support	<p>Meridian agrees that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S33.071.</p>
	<p>Fulton Hogan Ltd S43.016</p> <p>Considers the rule should include associated discharges and requests amendment to clause (g) to insert a 25m² threshold area over which no discharge is permitted.</p>	Support and oppose in part	<p>Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and opposes in its entirety clause (g);</p> <p>Decision requested: Allow S43.016 in part by providing for associated discharges in the chapeau to the rule and delete clause (g).</p>
	<p>Wellington International Airport Ltd S101.067</p> <p>Considers clause (g) is impractical and requests its deletion.</p>	Support	<p>Meridian considers clause (g) is impractical, unachievable and unreasonable;</p> <p>Decision requested: Allow S101.067.</p>
	<p>Transpower NZ Ltd S177.041</p>	Support	<p>Meridian agrees that the chapeau of the rule needs to provide for associated discharges (including discharges of sediment</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
(h) <u>or the coastal marine area, including via a stormwater network, and erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.</u>	Considers clause (g) is inappropriate as it conflicts with the minor discharges rule. Requests deletion of (g).		and/or flocculant) and considers that clause (g) is unachievable and unreasonable; Decision requested: Allow S177.041.
	David McKeivitt S190.003 Considers discharge of sediment from earthworks is unavoidable even with sediment controls. Requests amendment of clause (g) to refer to discharge that is not treated by erosion and sediment control measures.	Support in part	Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted; Decision requested: Allow S190.003 by deleting clause (g).
	Winstone Aggregated S206.059 Considers the rule should include associated discharges and requests deletion of clause (g).	Support in part	Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and considers clause (g) is impractical, unachievable and unreasonable; Decision requested: Allow S206.059.
	Orogen Ltd S239.009 Considers discharge of sediment from earthworks is unavoidable even with sediment controls. Requests amendment of clause (g) to refer to discharge that is not treated by erosion and sediment control measures.	Support in part	Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted; Decision requested: Allow S239.009 by deleting clause (g).

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>The Fuel Companies S258.023</p> <p>Considers clause (g) sets a zero tolerance approach and requests amendment to refer to best practice erosion and sediment control measures.</p>	Support in part	<p>Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;</p> <p>Decision requested: Allow S258.023 by deleting clause (g).</p>
	<p>NZTA S275.031</p> <p>Considers the clause (g) limit of no discharge is unworkable and requests amendment to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place.</p>	Support in part	<p>Meridian agrees that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S275.031 by deleting clause (g).</p>
<p><u>Rule WH.R24: Earthworks – restricted discretionary activity</u> <u>Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule WH.R23 is a restricted discretionary activity, provided the following conditions are met:</u> (a) <u>the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m³, except that, if at the time of</u></p>	<p>Horokiwi Quarries Ltd S2.038</p> <p>Opposes the direction to avoid earthworks in winter and requests deletion of clause (b) and the related matter of discretion (8).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S2.038.</p>
	<p>Summerset Group Holdings Ltd S38.019</p> <p>Opposes the requirement to seek a non-complying activity resource consent for winter earthworks.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and should be deleted (and considers the related discretionary matter (8) should also be deleted);</p> <p>Decision requested: Allow S38.019 and delete the related discretionary matter (8).</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m3, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than: (i) 20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or (ii) 30% in any other river, and</u></p> <p>(b) <u>earthworks shall not occur between 1st June and 30th September in any year.</u></p> <p><u>Matters for discretion</u></p> <p><u>1. The location, area, scale, volume, duration and staging and timing of works</u></p> <p><u>2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation</u></p> <p><u>3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site</u></p> <p><u>4. The proportion of un stabilised land in the catchment</u></p> <p><u>5. The adequacy and</u></p>	<p>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand S41.005</p> <p>Opposes the restriction on winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and should be deleted together with the related discretionary matter (8) which should also be deleted;</p> <p>Decision requested: Allow S41.005 by deleting clause (b) and the related discretionary matter (8).</p>
	<p>Fulton Hogan Ltd S43.017</p> <p>Considers there are many instances where earthworks can be undertaken without adverse effects during winter. Requests amendment of clause (b) to provide for winter earthworks in specified circumstances.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and considers it should be deleted together with the related discretionary matter (8) which should also be deleted;</p> <p>Decision requested: Allow S43.017 by deleting clause (b) and the related discretionary matter (8).</p>
	<p>Wellington International Airport Ltd S101.068</p> <p>Opposes clause (b) and matter of discretion (8) and requests deletion of (b) and (8) in their entirety, with provision for a separate restricted discretionary activity earthworks rule specifically for large scale earthworks for regionally significant infrastructure.</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted. Meridian would support a separate restricted discretionary activity rule for large scale earthworks for regionally significant infrastructure;</p> <p>Decision requested: Allow S101.068.</p>
	<p>Wellington Water Ltd S151.100</p> <p>Considers provision should be made for an exemption from clause (b) for regionally significant infrastructure to reflect the large</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted. Meridian would support a separate restricted discretionary activity rule for large scale earthworks for regionally significant infrastructure;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>efficiency of stabilisation devices for sediment control</u></p> <p>6. Any adverse effects on:</p> <p>(i) <u>groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori customary use) or Schedule I (important trout fishery rivers and spawning waters)</u></p> <p>(ii) <u>group drinking water supplies and community drinking water supplies</u></p> <p>(iii) <u>mauri, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species</u></p> <p>(iv) <u>the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment</u></p> <p>(v) <u>natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers</u></p>	<p>volume of earthwork that needs to be undertaken.</p>		<p>Decision requested: Allow S151.100.</p>
	<p>Gillies Group Management Ltd S161.025</p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S161.025 and delete related discretionary matter (8).</p>
	<p>Pukerua Holdings Ltd S165.025</p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S165.025 and delete related discretionary matter (8).</p>
	<p>Koru Homes NZ Ltd S169.020</p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S169.020 and delete related discretionary matter (8).</p>
	<p>Arakura Plains Development Ltd S173.025</p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S173.025 and delete related discretionary matter (8).</p>
	<p>Transpower NZ Ltd S177.042</p> <p>Considers the rule should provide for associated discharges (including discharges of sediment and/or flocculant). Opposes non-complying activity status for winter earthworks and</p>	Support	<p>Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S177.042.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<u>7. Duration of the consent</u> <u>8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period</u> <u>9. Monitoring and reporting requirement</u>	requests deletion of clause (b) and related discretionary matter (8).		
	David McKeivitt S190.004 Opposes the blanket restriction on winter earthworks. Requests amendment to provide for winter earthworks in specified circumstances.	Support in part	Meridian agrees clause (b) is unreasonable and unnecessary; Decision requested: Allow S190.004 by deleting clause (b) and related discretionary matter (8).
	Wairarapa Federated Farmers S193.101 Requests retention of the operative NRP rule and deletion of Rule WH.R24.	Support in part	Meridian agrees the operative NRP rule framework is preferable and sufficient; Decision requested: Allow S191.101 in part by deleting clause (b) and related discretionary matter (8).
	Winstone Aggregates Ltd S206.060 Opposes non-complying activity status for winter earthworks. Considers there is insufficient evidence to support this and requests deletion of clause (b) and related discretionary matter (8).	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary; Decision requested: Allow S206.060.
	Guildford Timber Company, Silverstream Forest Limited and Goodwin Estate Trust S210.052 Opposes the winter shut down period and requests deletion of clause (b).	Support in part	Meridian agrees clause (b) is unreasonable and unnecessary; Decision requested: Allow S210.052 by deleting clause (b) and related discretionary matter (8).

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Hutt City Council S211.024</p> <p>Disagrees with the s. 32 evaluation about the need for winter earthworks restriction. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S211.024 and delete related discretionary matter (8).</p>
	<p>RP Mansell, AJ Mansell & MR Mansell S217.012</p> <p>Considers the shut down period for winter earthworks is onerous and unnecessary. Requests deletion of winter shut down requirements.</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S217.012 and delete related discretionary matter (8).</p>
	<p>Cuttriss Consultants Ltd S219.020</p> <p>Opposes the requirement for non-complying activity resource consent to undertake winter earthworks. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S219.020 and delete related discretionary matter (8).</p>
	<p>EDS S222.064</p> <p>Requests the rule is made a discretionary activity.</p>	Oppose	<p>Restricted discretionary activity status provides sufficient rigour to address likely environmental effects;</p> <p>Decision requested: Disallow S222.064.</p>
	<p>Orogen Ltd S239.011</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S239.011 and delete related discretionary matter (8).</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	Considers non-complying activity status for winter earthworks is inappropriate and requests deletion of clause (b).		
	<p>Carrus Corporation Ltd S247.020</p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S247.020 and delete related discretionary matter (8).</p>
	<p>Department of Corrections S248.042</p> <p>Considers the rule should provide for associated discharges (including discharges of sediment and/or flocculant). Opposes non-complying activity status for winter earthworks and requests deletion of clause (b) and related discretionary matter (8).</p>	Support	<p>Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S248.042.</p>
	<p>Thames Pacific S252.019</p> <p>Opposes non-complying activity status for winter earthworks and requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S252.019 and delete related discretionary matter (8).</p>
	<p>Woodridge Holdings Ltd S255.039</p> <p>Notes that, while there is greater potential for earthworks to have adverse effects in winter, these can be addressed. Also opposes the</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S255.039 and delete related discretionary matter (8).</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	proportion of catchment limit. Requests deletion of clause (b).		
	<p>Kāinga Ora S257.037</p> <p>Opposes condition (b) and the resulting escalation to a non-complying activity. Requests deletion of (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S257.037 and delete related discretionary matter (8).</p>
	<p>The Fuel Companies S258.024</p> <p>Considers the rule should focus on best practice erosion and sediment control. Requests amendments to this effect but retains proposed clause (b).</p>	Oppose in part	<p>Meridian considers the clause (b) restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Disallow S258.024 in part by deleting clause (b) and related discretionary matter (8).</p>
	<p>Cannon Point Development Ltd S260.017</p> <p>Opposes the winter shut down restriction and requests deletion of clause (b) and related discretionary matter (8).</p>	Support	<p>Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S260.017.</p>
	<p>Forest & Bird S261.117</p> <p>Requests the rule is reclassified a discretionary activity.</p>	Oppose	<p>Restricted discretionary activity status provides sufficient rigour to address likely environmental effects;</p> <p>Decision requested: Disallow S261.117.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>NZTA S275.032</p> <p>Considers the rule needs to be amended to provide the ability for some sediment and/or flocculant discharge.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S275.032 by deleting clause (b) and related discretionary matter (8).</p>
	<p>Civil Contractors NZ S285.025</p> <p>Strongly opposes and considers the winter earthworks shutdown is inappropriate. Requests amendment of clause (b) to ensure sufficient and appropriate exemptions exist to provide some ability for earthworks where potential sediment can be well managed and controlled. At a minimum, a provision should be added for regionally significant infrastructure.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and agrees there should, at the least, be provision for winter earthworks for regionally significant infrastructure (subject to appropriate conditions). Meridian's preference is that clause (b) and related discretionary matter (8) are deleted;</p> <p>Decision requested: Allow S285.025 by deleting clause (b) and related discretionary matter (8).</p>
	<p>Taranaki Whānui S286.088</p> <p>Supports the intent of clause (b) but considers this issue can be addressed through consent conditions. Notes that the terms of the winter shut down are a restricted discretionary matter and therefore it does not make sense to escalate to a non-complying activity under Rule WH.R25. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S286.088 by deleting clause (b) and related discretionary matter (8).</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>Rule WH.R25: Earthworks – non-complying activity</u> Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water from earthworks, including via a stormwater network, that does not comply with Rule WH.R24 is a non-complying activity.</p>	<p>Horokiwi Quarries Ltd S2.039</p> <p>Considers the non-complying activity rule is not sufficiently justified in the s. 32 evaluation and does not appropriately provide for activities that do not meet restricted discretionary activity conditions, but which can be managed through consent conditions. Requests amendment to make this default rule a discretionary activity.</p>	Support in part	<p>The non-complying activity status is not the most effective or efficient approach. The potential sedimentation and water contamination issues can be comprehensively addressed through effects based conditions. Meridian considers winter earthworks should be provided for as restricted discretionary activities, subject to conditions. Non-compliance with effects-based conditions should be discretionary activity, not non-complying activity;</p> <p>Decision requested: Allow S2.039 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>Fulton Hogan Ltd S43.018</p> <p>Considers the non-complying activity status is too restrictive given the number of activities that would be captured under Rule WH.R25. Requests amendment to provide for low level earthworks activities.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate;</p> <p>Decision requested: Allow S43.018 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>Wellington International Airport Ltd S101.069</p> <p>Notes most of WIAL earthworks activities will be captured by Rule WH.R25. Requests a separate restricted discretionary activity earthworks rule for large scale earthworks that provide for regionally significant infrastructure.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate;</p> <p>Decision requested: Allow S101.069 as alternative relief to providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Transpower NZ Ltd S177.043</p> <p>Considers non-complying activity status for minor breaches of rule conditions is inappropriate for earthworks associated with the National Grid. Requests amendment to discretionary activity.</p>	Support in part	<p>Meridian agrees non-complying activity status is inappropriate for the scope of breaches contemplated by the rule, for the National Grid and for all regionally significant infrastructure (including renewable electricity generation);</p> <p>Decision requested: Allow S177.043 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>Wairarapa Federated Farmers S193.102</p> <p>Requests retention of the operative NRP rule and deletion of Rule WH.R25.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate;</p> <p>Decision requested: Allow S193.102 by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>Guildford Timber Company, Silverstream Forest Limited and Goodwin Estate Trust S210.053</p> <p>Considers non-complying activity status for earthworks that do not comply with Rule WH.R24 is onerous and unnecessary. Requests amendment to discretionary activity.</p>	Support in part	<p>Meridian agrees the non-complying activity status is onerous, particularly for earthworks associated with large scale regionally significant infrastructure projects;</p> <p>Decision requested: Allow S210.053 by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>RP Mansell, AJ Mansell & MR Mansell S217.013</p> <p>Generally supports the effects management approach but considers discretionary activity is</p>	Support in part	<p>Meridian considers winter works should be provided for as restricted discretionary activities, subject to conditions. Non-compliance with effects-based conditions should be discretionary activity, not non-complying activity;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	more appropriate than non-complying activity status. Requests amendment to discretionary activity.		Decision requested: Allow S217.013 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.
	<p>Department of Corrections S248.043</p> <p>Considers non-complying activity status for earthworks that do not comply with Rule WH.R24 is onerous and unnecessary. Non-complying activity status for minor breaches of rule conditions is problematic for bundled consents which results in a high degree of uncertainty. Requests amendment to discretionary activity.</p>	Support in part	<p>Meridian agrees the non-complying activity status is onerous, particularly for earthworks associated with large scale regionally significant infrastructure projects. Meridian considers winter works should be provided for as restricted discretionary activities, subject to conditions. Non-compliance with effects-based conditions should be discretionary activity, not non-complying activity;</p> <p>Decision requested: Allow S248.043 by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>Kāinga Ora S257.038</p> <p>Opposes the non-complying rule insofar as it relates to winter works. Requests deletion of Rule WH.R25 and provision for winter works as a discretionary matter under Rule WH.R24.</p>	Support in part	<p>Meridian agrees the non-complying activity status is onerous and unnecessary, including for non-compliance with the winter works restriction, and considers the default rule should be discretionary activity;</p> <p>Decision requested: Allow S257.038 by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>Rule WH.R30: The use of land for farming activities – discretionary activity</u> <u>The use of land for the farming activities described in Rule WH.R26 or Rule WH.R27, and the associated discharge of contaminants into a surface water body or into or onto land where a contaminant may enter freshwater, that does not meet one or more of the conditions of Rule WH.R26 or Rule WH.R27 is a discretionary activity provided the following conditions are met:</u></p> <p>(a) <u>the most recent Wellington Regional Council monitoring record at the time the application is lodged demonstrates that the concentration of dissolved inorganic nitrogen, dissolved reactive phosphorus, or measure of visual clarity, for the relevant catchment does not exceed the target attribute state at any monitoring site within the relevant part Freshwater Management Unit set out in Table 8.4, and</u></p> <p>(b) <u>if the most recent Wellington Regional Council monitoring record at the time the application is lodged demonstrates that the concentration of Escherichia coli, for the relevant catchment exceeds the target attribute state at any monitoring site</u></p>	<p>Wairarapa Federated Farmers S193.108</p> <p>Requests deletion of Rule WH.R30.</p>	Support in part	<p>Meridian opposes the requirement in Condition (b) of Rule WH.R27 and Schedule 36 that at least 50% of the area of highest and high erosion risk land must be re-vegetated in permanent woody vegetation where this will conflict with the operational and functional needs of existing lawfully established wind farms. Meridian seeks an exemption from these re-vegetation requirements for lawfully established renewable electricity generation activities and opposes the Rule WH.R30 requirement for discretionary activity consent for non-compliance with this requirement;</p> <p>Decision requested: Allow S193.108 by excluding from Rule WH.R30 farmland comprised within or associated with lawfully established renewable electricity generation wind farms.</p>
	<p>GWRC S238.022</p> <p>Seeks to correct an error in clause (b): ‘.....the land use change is not to pastoral land use.’</p>	Oppose	<p>Meridian opposes the requirement in Condition (b) of Rule WH.R27 and Schedule 36 that at least 50% of the area of highest and high erosion risk land must be re-vegetated in permanent woody vegetation where this will conflict with the operational and functional needs of existing lawfully established wind farms. Meridian seeks an exemption from these re-vegetation requirements for lawfully established renewable electricity generation activities and opposes the Rule WH.R30 requirement for discretionary activity consent for non-compliance with this requirement;</p> <p>Decision requested: Disallow S238.022 and exclude from Rule WH.R30 farmland comprised within or associated with lawfully established renewable electricity generation wind farms.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>within the relevant part Freshwater Management Unit set out in Table 8.4, the land use change is not to pastoral land use.</u></p>	<p>EDS S222.070</p> <p>Supports.</p>	<p>Oppose in part</p>	<p>Meridian opposes the requirement in Condition (b) of Rule WH.R27 and Schedule 36 that at least 50% of the area of highest and high erosion risk land must be re-vegetated in permanent woody vegetation where this will conflict with the operational and functional needs of existing lawfully established wind farms. Meridian seeks an exemption from these re-vegetation requirements for lawfully established renewable electricity generation activities and opposes the Rule WH.R30 requirement for discretionary activity consent for non-compliance with this requirement;</p> <p>Decision requested: Disallow S222.070 and exclude from Rule WH.R30 farmland comprised within or associated with lawfully established renewable electricity generation wind farms.</p>
	<p>Forest & Bird S261.124</p> <p>Supports and requests retention as notified.</p>	<p>Oppose in part</p>	<p>Meridian opposes the requirement in Condition (b) of Rule WH.R27 and Schedule 36 that at least 50% of the area of highest and high erosion risk land must be re-vegetated in permanent woody vegetation where this will conflict with the operational and functional needs of existing lawfully established wind farms. Meridian seeks an exemption from these re-vegetation requirements for lawfully established renewable electricity generation activities and opposes the Rule WH.R30 requirement for discretionary activity consent for non-compliance with this requirement;</p> <p>Decision requested: Disallow S261.124 and exclude from Rule WH.R30 farmland comprised within or associated with lawfully established renewable electricity generation wind farms.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Taranaki Whānui S286.095</p> <p>Supports and requests retention as notified.</p>	Oppose in part	<p>Meridian opposes the requirement in Condition (b) of Rule WH.R27 and Schedule 36 that at least 50% of the area of highest and high erosion risk land must be re-vegetated in permanent woody vegetation where this will conflict with the operational and functional needs of existing lawfully established wind farms. Meridian seeks an exemption from these re-vegetation requirements for lawfully established renewable electricity generation activities and opposes the Rule WH.R30 requirement for discretionary activity consent for non-compliance with this requirement;</p> <p>Decision requested: Disallow S286.095 and exclude from Rule WH.R30 farmland comprised within or associated with lawfully established renewable electricity generation wind farms.</p>
<p><u>Rule WH.R32: Farming activities – non-complying activity</u> <u>Any:</u> (a) <u>use of land for the activities described in Rule WH.R26 or Rule WH.R27 and the associated discharge of contaminants into a surface water body or into or onto land where a contaminant may enter freshwater, that does not meet one or more of the conditions of Rule WH.R30, or</u> (b) <u>change in land use described in Rule WH.R31 and the associated discharge of contaminants into a surface water body or into or onto land where a contaminant may enter freshwater that does not meet one or</u></p>	<p>Wairarapa Federated Farmers S193.110</p> <p>Considers the rule is disproportionate and requests deletion of Rule WH.R32.</p>	Support	<p>Meridian agrees the rule is disproportionate;</p> <p>Decision requested: Allow S193.110.</p>
	<p>Forest & Bird S261.126</p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Rule WH.R32 is disproportionate;</p> <p>Decision requested: Disallow S261.126.</p>
	<p>Taranaki Whānui S286.097</p> <p>Supports in principle and requests retention as notified.</p>	Oppose	<p>Rule WH.R32 is disproportionate;</p> <p>Decision requested: Disallow S286.097.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>more of the conditions of Rule WH.R31</u> is a non-complying activity.</p>			
<p>Chapter 9 Proposed Provisions for Te Awarua-o-Porirua:</p>			
<p><u>Objective P.01</u> <u>The health of Te Awarua-o-Porirua's groundwater, rivers, lakes, natural wetlands, estuaries, harbours and coastal marine area is progressively improved and is wai ora by 2100.</u></p> <p><u>Note</u> <u>In the wai ora state:</u></p> <ul style="list-style-type: none"> • <u>Te Awarua-o-Porirua is a taonga of Ngāti Toa Rangatira and must be respected by others</u> • <u>Mauri is restored and waters are in a natural state</u> • <u>Ecological health is excellent in freshwater and coastal water environments</u> • <u>Rivers flow naturally, with ripples and the river beds are stony</u> • <u>Mahinga kai, taonga, mahinga ika and kaimoana species are healthy, abundant, diverse, present across all stages of life, sizeable, and able to be culturally harvested by mana whenua</u> • <u>Mahinga kai, taonga, mahinga ika and kai moana species are safe to harvest</u> 	<p>Transpower NZ Ltd S177.044</p> <p>Supports progressive improvement but does not consider restoration of natural character of all freshwater bodies and coastal marine area can be reasonably achieved where there is existing RSI located over or within freshwater bodies or the coastal marine area, if the objective is read as meaning that infrastructure must be removed. Considers the objective should acknowledge complete restoration of character may not be possible in all instances as relates to RSI. Requests insertion of 'Mauri is restored and waters are in a natural state to the extent that this is possible,'.</p>	<p>Support in part</p>	<p>Meridian agrees the policy should acknowledge lawfully established existing infrastructure and require restoration to the extent that is practicable.</p> <p>Decision requested: Allow S177.044 by inserting the words '...where practicable,'.</p>
	<p>Porirua City Council S240.024</p> <p>Supports the 100 year vision towards restoration but considers it is not possible for waters to be in a natural state and suggests a qualifier is needed. Requests insertion of 'Mauri is restored, and waters restored to are in a natural state where possible.'</p>	<p>Support in part</p>	<p>Meridian agrees the policy should acknowledge lawfully established existing infrastructure and require restoration to the extent that is practicable.</p> <p>Decision requested: Allow S240.024 by inserting the words 'Mauri is restored, and waters restored to are in a natural state where practicable possible.'</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>and eat or use, including for mana whenua to exercise manaakitanga</u></p> <ul style="list-style-type: none"> • <u>Mana whenua and communities are able to undertake a full range of activities</u> • <u>Mana whenua are able to undertake cultural activities and practices</u> 	<p>Kāinga Ora S257.039</p> <p>Supports the proposed objectives but notes that some objectives would be difficult to achieve. Seeks amendment to align with but not go beyond NPS-FM.</p>	<p>Support in part</p>	<p>Meridian agrees that some of the outcomes detailed in the note to the objective will be difficult to achieve;</p> <p>Decision requested: Allow S257.039 in part by amending as requested for S177.044 and S240.024.</p>
<p><u>Policy P.P2 Management of activities to achieve target attribute states and coastal water objectives</u> <u>Target attribute states and coastal water objectives will be achieved by regulating discharges and land use activities in the Plan, and non-regulatory methods, including Freshwater Action Plans, by:</u></p> <p>(a) <u>prohibiting unplanned greenfield development and for other greenfield developments minimising the contaminants and requiring financial contributions as to offset adverse effects from residual stormwater contaminants, and</u></p> <p>(b) <u>encouraging redevelopment activities within existing urban areas to reduce the existing urban contaminant load, and</u></p> <p>(c) <u>imposing hydrological controls on urban development and stormwater discharges to rivers</u></p> <p>(d) <u>requiring a reduction in contaminant loads from urban wastewater and stormwater networks, and</u></p>	<p>Wairapa Federated Farmers S193.120</p> <p>Requests deletion of (g) and (h).</p>	<p>Support in part</p>	<p>Meridian opposes any requirement to re-vegetate with woody vegetation any land within its Mill Creek wind farm because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S193.120 in part by deleting the reference to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p>Willowbank Trustee Ltd S204.002</p> <p>Considers land and soil qualities restrict ability to establish woody vegetation. Requests amendment to '...with woody vegetation <u>where practicable to do so</u>'.</p>	<p>Support in part</p>	<p>Meridian notes that land and soil qualities are not the only restriction on the practicability of establishing woody vegetation. Meridian opposes any requirement to re-vegetate with woody vegetation any land within its Mill Creek wind farm because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S204.002 in part by deleting the reference to re-vegetation with woody vegetation or amend the</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>(e) <u>stabilising stream banks by excluding livestock from waterbodies and planting riparian margins with indigenous vegetation, and</u></p> <p>(f) <u>requiring the active management of earthworks, forestry, cultivation, and vegetation clearance activities, and</u></p> <p>(g) <u>soil conservation treatment, including revegetation with woody vegetation, of land with high erosion risk, and</u></p> <p>(h) <u>requiring farm environment plans (including Freshwater Farm Plans) to improve farm practices that impact on freshwater.</u></p>			reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.
<p><u>Policy P.P22: Achieving reductions in sediment discharges from farming activities on land with high risk of erosion</u> <u>Reduce discharges of sediment from farming activities on high erosion risk land and highest erosion risk land by:</u></p> <p>(a) <u>identifying highest erosion risk land (pasture) and high erosion risk land (pasture), and</u></p> <p>(b) <u>requiring that farm environment plans prepared for farms with highest erosion risk land (pasture) and/or high erosion risk land (pasture) include an erosion risk treatment plan, and</u></p>	<p>Diane Strugnell S5.010</p> <p>Considers the mapping needs to be accurate at farm scale and that alternative methods should be supported. Requests deletion of clause (c) (i) requirement for permanent woody revegetation.</p>	Support	<p>Meridian opposes any requirement to re-vegetate with woody vegetation any land within its Mill Creek wind farm because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S5.010 by deleting the reference in clause (3) to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p>Donald Love S102.001</p>	Support in part	<p>Meridian opposes any requirement to re-vegetate with woody vegetation any land within its West Wind and Mill Creek wind farms because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>(c) <u>ensuring erosion risk treatment plans:</u></p> <p>(i) <u>deliver permanent woody vegetation cover on at least 50% of highest risk erosion land (pasture) that is in pasture on a farm within 10 years and appropriate erosion control treatment for the remaining highest risk erosion land (pasture) and high erosion risk land (pasture) that is in pasture on the farm, and</u></p> <p>(ii) <u>identify and respond to risks of sediment loss on high erosion risk land (pasture) associated with grazing livestock, earthworks or vegetation clearance, by using effective erosion control treatment, and</u></p> <p>(d) <u>Wellington Regional Council providing support to landowners to implement erosion risk treatment plans.</u></p>	<p>Considers only a small percentage of sediment is from highest erosion risk land (pasture). Requests removal of the requirement for revegetation of 50% of land with permanent woody vegetation.</p>		<p>generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S102.001 in part by deleting the reference in clause (3) to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p>Wairarapa Federated Farmers S193.133</p> <p>Considers the issue is addressed by relief sought on Policy P.P21. Considers Council cannot require revegetation by regulation. Requests deletion of Policy P.P22.</p>	Support in part	<p>Meridian opposes any requirement to re-vegetate with woody vegetation any land within its West Wind and Mill Creek wind farms because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S193.133 in part by deleting the reference in clause (3) to re-vegetation with woody vegetation or amend the reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.</p>
	<p>Willowbank Trustee Ltd S204.006</p> <p>Considers it is not always possible to establish woody vegetation due to differing land qualities. Clause (c) (i) should focus on addressing erosion risk in an achievable and appropriate manner, rather than requiring a 'one size fits all'. Requests deletion of requirement for permanent woody vegetation.</p>	Support in part	<p>Meridian notes that land and soil qualities are not the only restriction on the practicability of establishing woody vegetation. Meridian opposes any requirement to re-vegetate with woody vegetation any land within its Mill Creek wind farm because this may conflict with or become an obstacle to the continued operation, maintenance and upgrading of its generation activities, contrary to the objective and policies of the NPS-REG;</p> <p>Decision requested: Allow S204.006 in part by deleting the reference to re-vegetation with woody vegetation or amend the</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
			reference to clarify that it does not apply to land used for renewable electricity generation or only 'where practicable'.
<p><u>Policy P.P27: Management of earthworks sites</u> <u>The risk of sediment discharges from earthworks shall be managed by:</u></p> <p>(a) <u>requiring retention of soil and sediment on the site using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021), for the duration of the land disturbance, and</u></p> <p>(b) <u>limiting the amount of land disturbed at any time, and</u></p> <p>(c) <u>designing and implementing earthworks with knowledge of the existing environmental site constraints, specific engineering requirements and implementation of controls to limit the discharge of sediment to receiving environments, and</u></p> <p>(d) <u>requiring erosion and sediment control measures to be installed prior to, and during earthworks and ensuring those controls remain in</u></p>	<p>Transpower NZ Ltd S177.051</p> <p>Considers the requirement to retain soil and sediment on site does not recognise that soil and sediment may need to be removed from site in a controlled manner as part of works associated with maintenance, upgrading, or development of regionally significant infrastructure. Requests amendments:</p> <p>'The risk adverse effects of sediment discharges from earthworks shall be managed by:</p> <p>(a) requiring retention minimising the uncontrolled loss of soil and sediment on the site using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021), for the duration of the land disturbance, and</p> <p>(b) limiting, where practicable, the amount of land disturbed at any time, and...'</p>	Support	<p>Meridian agrees that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;</p> <p>Decision requested: Allow S177.051.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<u>place and are maintained until the land is stabilised against erosion.</u>	<p>Wairarapa Federated Farmers S193.138</p> <p>Considers the issue is addressed by existing operative NRP provisions. Requests deletion of Policy P.P27.</p>	Support in part	<p>Meridian considers that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;</p> <p>Decision requested: Allow S193.138 in part by amending Policy P.P27 as requested for S177.051.</p>
	<p>Winstone Aggregates S206.074</p> <p>Requests amendments:</p> <p>'The risk adverse effects associated with of sediment discharges from earthworks shall be managed by:</p> <p>(a) requiring retention of soil and sediment on the land undertaking earthworks in accordance with using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in general accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021), for the duration of the land disturbance, and</p> <p>(b) where practicable, limiting the amount of land disturbed at any time, and...'</p>	Support	<p>Meridian agrees that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;</p> <p>Decision requested: Allow S206.074 to the extent any amendments are consistent with the relief requested for S177.051.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Department of Corrections S248.050</p> <p>Considers the requirement to retain soil and sediment on site does not recognise that soil and sediment may need to be removed from site in a controlled manner as part of works associated with maintenance, upgrading, or development of regionally significant infrastructure. Requests amendments:</p> <p>'The risk adverse effects of sediment discharges from earthworks shall be managed by:</p> <p>(a) requiring retention minimising the uncontrolled loss of soil and sediment on the site using good management practices for erosion and sediment control measures that are appropriate to the scale and nature of the activity, and in accordance with the Greater Wellington Regional Council Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Wellington Region (2021), for the duration of the land disturbance, and</p> <p>(b) limiting, where practicable, the amount of land disturbed at any time, and...'</p>	Support	<p>Meridian agrees that complete retention of soil and sediment on site is not practicable in all situations, including where soil and sediment need to be removed from site in a controlled manner;</p> <p>Decision requested: Allow S248.050.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>Policy P.P29: Winter shut down of earthworks Earthworks over 3,000m² in area shall:</p> <p>(a) <u>be shut down from 1st June to 30th September each year, and</u></p> <p>(b) <u>prior to shut down, be stabilised against erosion and have sediment controls in place using good management practices in accordance with the GWRC Erosion and Sediment Control Guideline for the Wellington Region (2021).</u></p>	<p>P F Olsen Ltd S18.057</p> <p>Considers the winter shutdown for earthworks will have significant economic burdens for construction projects and requests deletion of the provision.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S18.057.</p>
	<p>Christine Stanley S26.016</p> <p>Considers the policy does not allow for stabilisation and access track maintenance and requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S26.016.</p>
	<p>Summerset Group Holdings Ltd S38.025</p> <p>Opposes the requirement to seek a non-complying activity resource consent to undertake winter earthworks and requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S38.025.</p>
	<p>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand S41.006</p> <p>Considers any winter earthworks can be dealt with through conditions of consent and opposes the requirement for non-complying activity consent for winter earthworks. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S41.006.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Wellington Water Ltd S151.122</p> <p>Considers the policy is excessive and requests an exemption for regionally significant infrastructure.</p>	Support in part	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S151.122 by deleting Policy P.P29.</p>
	<p>Gillies Group Management Ltd S161.030</p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S161.030.</p>
	<p>Pukerua Holdings Limited S165.030</p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S165.030</p>
	<p>Koru Homes NZ Limited S169.025</p> <p>Opposes non-complying activity status for winter earthworks and notes that large rain events at any time can cause larger pulses of sediment. The current practice for managing winter</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S169.025.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	earthworks with GWRC oversight is sufficient. Requests deletion of Policy P.P29.		
	<p>Arakura Plains Development Limited S173.030</p> <p>Opposes non-complying activity status for winter earthworks and notes that large storm events can occur throughout the year. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S173.030.</p>
	<p>Transpower NZ Limited S177.053</p> <p>Considers the policy is inappropriate as it does not recognise there may be circumstances where earthworks need to occur in order to provide for safe and efficient operation, maintenance, upgrading or development of regionally significant infrastructure. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S177.053.</p>
	<p>David McKeivitt S190.006</p> <p>Considers the length of proposed winter shut down is too onerous. Requests amendment to provide for a risk-based approach.</p>	Oppose	<p>Meridian considers that the risk-based approach can be achieved through conditions of consent directed by other policies;</p> <p>Decision requested: Allow S190.006 by deleting Policy P.P29.</p>
	<p>Wairarapa Federated Farmers S193.140</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	Considers the issue is addressed by existing NRP provisions and requests deletion of Policy P.P29.		Decision requested: Allow S193.140.
	<p>RP Mansell, J Mansell & MR Mansell S217.023</p> <p>Considers the proposed winter shut down is onerous and unnecessary in light of the other provisions. Requests deletion of winter shut down requirements.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S217.023.</p>
	<p>Cuttriss Consultants Ltd S219.025</p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S219.025.</p>
	<p>Orogen Limited S239.012</p> <p>Does not support earthworks during the period 1st June to 30th September being a non-complying activity, however acknowledges that seasonal variations in rainfall and groundwater should be taken into consideration.</p>	Support and oppose in part	<p>Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;</p> <p>Decision requested: Allow S239.012 in part by deleting Policy WH.P31.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Porirua City Council S240.060</p> <p>Considers large storm events can cause larger pulses of sediment discharges at any time throughout the year. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian agrees earthworks during the winter period should not require consent as a non-complying activity but considers the policy should be deleted, not amended;</p> <p>Decision requested: Allow S240.060.</p>
	<p>Carrus Corporation Ltd S247.025</p> <p>Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S247.025.</p>
	<p>Department of Corrections S248.052</p> <p>Considers the policy is inappropriate, there are instances where earthworks are unavoidable at this time and, with careful management, can be undertaken in a manner that avoids, remedies, or mitigates adverse effects. Requests deletion of Policy P.P29.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S248.52.</p>
	<p>Thames Pacific S252.023</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	Opposes the requirement for non-complying resource consent to undertake earthworks. Notes that high rainfall events can occur during any time of the year, including summer when the ground is less permeable. S. 32 report fails to justify why this measure is required. Requests deletion of Policy P.P29.		Decision requested: Allow S252.023.
	Best Farm Ltd S254.011 Considers it is possible and reasonable to work into June or start in September after a dry winter. Requests deletion of Policy P.P29 or amendment to have more flexibility for winter works.	Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure. Meridian supports deletion, not amendment, of the policy; Decision requested: Allow S254.011.
	Woodridge Holdings Ltd S255.051 Considers the policy is not effects based as not every earthworks project over 3000m ² will have adverse effects at this time. Requests deletion of Policy WH.P31.	Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure; Decision requested: Allow S255.051.
	Kāinga Ora S257.054 Opposes Policy WH.P31 and the non-complying rule framework. Considers winter works can be adequately considered as a listed discretionary matter within a RDA rule. Requests deletion of	Support	Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure; Decision requested: Allow S257.054 by deleting Policy P.P29.

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	Policy P.P29 and consequential changes to related rule framework		
	<p>Goodman Contractors Ltd S274.003</p> <p>Considers the restriction will have an economic impact. Considers where sites are low risk, winter work should be able to occur. Seeks amendment to provide a more enabling framework for winter works.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S274.003 by deleting Policy P.P29.</p>
	<p>NZTA S275.036</p> <p>Prohibiting earthworks during the winter period would impose significant constraints on NZTA's essential works construction programme. Requests removal of the winter works control, or provision for a process for winter works approval without the need for consent.</p>	Support	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S275.036 by deleting Policy P.P29.</p>
	<p>Civil Contractors NZ S285.031</p> <p>Considers the winter shut down is inappropriate as many works may be able to be managed with no adverse effects. Requests amendment to ensure sufficient and appropriate exemptions, at a minimum for regionally significant infrastructure.</p>	Support in part	<p>Meridian considers the blanket approach of the policy is inappropriate particularly for projects to establish or upgrade regionally significant infrastructure;</p> <p>Decision requested: Allow S285.031 by deleting Policy P.P29.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>Rule P.R4: Stormwater from an existing high risk industrial or trade premise – permitted activity</u> <u>The discharge of stormwater from an existing high risk industrial or trade premise, that is not a port or airport, into water, or onto or into land where it may enter water, including via an existing local authority stormwater network, is a permitted activity, provided the following conditions are met:</u></p> <p>(a) <u>the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and</u></p> <p>(b) <u>the discharge does not contain wastewater, and</u></p> <p>(c) <u>if the discharge is to land where it may enter groundwater,</u></p> <p>(i) <u>the discharge cannot cause or exacerbate the flooding of any other property, and</u></p> <p>(ii) <u>the discharge is not located within 20m of a bore used for water abstraction for potable supply or stock water, and</u></p> <p>(d) <u>any contaminants stored or used on site, or hazardous substances, cannot be entrained in stormwater and enter a surface water body or coastal water, including via the stormwater network, or</u></p>	<p>Transpower NZ Ltd S177.057</p> <p>Considers the limitation to existing facilities would result in new substations or switchyards being a discretionary activity. Requests deletion of ‘existing’. Also requests deletion of ‘contaminants’ so that the focus is on hazardous substances stored or used on site.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S177.057.</p>
	<p>Firth Industries Limited S207.026</p> <p>Considers there will be no difference in effects associated with stormwater discharge from existing or new such premises and both should be provided for. Requests deletion of ‘existing’ and deletion of ‘contaminants’ to focus on hazardous substances.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S207.026.</p>
	<p>Department of Corrections S248.059</p> <p>Considers there will be no difference in effects associated with stormwater discharge from existing or new such premises and both should be provided for. Requests deletion of ‘existing’ and deletion of ‘contaminants’ to focus on hazardous substances.</p>	Support	<p>Meridian agrees that the standards proposed are sufficient to address the effects from all existing and new power stations, substations and switchyards and that the focus should be on hazardous substances;</p> <p>Decision requested: Allow S248.059.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>(i) <u>there is a containment system in place to intercept and contain any spillage of hazardous substances for storage and removal, or</u></p> <p>(ii) <u>the stormwater contains no hazardous substances except petroleum hydrocarbons, and in that situation, the stormwater is treated by an interceptor and the treated discharge does not contain more than 15 milligrams per litre of total petroleum hydrocarbons, and</u></p> <p>(e) <u>if the discharge is into a surface water body, coastal water or via an existing local authority stormwater network, the concentration of total suspended solids in the discharge shall not exceed:</u></p> <p>(i) <u>50g/m3 where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or</u></p> <p>(ii) <u>100g/m3 where the discharge enters any other water,</u></p>			

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>and where the discharge is not via an existing local authority stormwater network the discharge shall also not:</u></p> <p>(f) <u>cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and</u></p> <p>(g) <u>give rise to the following effects beyond the zone of reasonable mixing:</u></p> <p>(i) <u>the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or</u></p> <p>(ii) <u>any conspicuous change in the colour, or</u></p> <p>(iii) <u>a decrease in water clarity of more than</u></p> <p>1. <u>20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes),</u> <u>or</u></p> <p>2. <u>30% in any other river, or</u></p> <p>(iv) <u>any emission of objectionable odour, or</u></p> <p>(v) <u>the freshwater is unsuitable for consumption by farm animals,</u> <u>or</u></p> <p>(vi) <u>any significant adverse effects on aquatic life.</u></p>			

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>Note For the creation of new or redevelopment of existing impervious surfaces for high risk industrial and trade premises and the associated discharge of stormwater, refer to P.R10.</u></p>			
<p><u>Rule P.R5: Stormwater from new and redeveloped impervious surfaces – permitted activity</u> <u>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment activities of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing or new local authority stormwater network, that is not a high risk industrial or trade premise or unplanned greenfield development, is a permitted activity, provided the following conditions are met:</u></p> <p>(a) <u>the proposal involves the creation of new, or redevelopment of existing impervious areas of less than 1,000m² (baseline property existing impervious area as at 30 October 2023) and</u></p> <p>(b) <u>all new building materials associated with the development shall not</u></p>	<p>Wellington City Council S33.110</p> <p>Considers the consenting framework duplicates consenting requirements. Requests deletion of Rule P.R5 or amendment to limit its applicability to development that is not connected to local authority stormwater networks.</p>	Support in part	<p>It is apparent from the PC1 policies that this and related rules were intended to focus on the urban environment. The reference in Rule WH.R5 to ‘new’ impervious surfaces captures new paved and sealed surfaces in the rural environment. Meridian reiterates the concerns expressed about the definition of ‘impervious surfaces’ and the application of the rules to impervious surfaces in rural environments. The water quality standards are appropriate but the 1000m² area limit is not relevant for regionally significant infrastructure projects on large sites (such as wind farms) in the rural environment;</p> <p>Decision requested: Allow S33.110 in part by limiting the applicability of the rule to development located in urban environments or deleting the 1000m² area limit and/or amending the definition of ‘impervious surfaces’ so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand S41.007</p>	Support	<p>Meridian agrees the rule is not relevant for telecommunications infrastructure and considers the exclusion should also be for all regionally significant infrastructure located in any rural zone. Meridian reiterates the concerns expressed about the definition of ‘impervious surfaces’ and the application of the</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>include exposed zinc (including galvanised steel) or copper roof, cladding and spouting materials, and</u></p> <p>(c) <u>the proposal provides hydrological control measures (for example rain tanks) onsite or offsite, where discharges will enter a surface water body (including via an existing local authority stormwater network):</u></p> <p>(i) <u>for all impervious areas associated with a greenfield development, or</u></p> <p>(ii) <u>for all redeveloped and new impervious areas involving greater than 30m² of impervious area of a redevelopment (of an existing urbanised property), and</u></p> <p>(d) <u>the discharge is not from, onto or into SLUR Category III land, unless the stormwater does not come into contact with SLUR Category III land, and</u></p> <p>(e) <u>the discharge does not contain wastewater, and</u></p> <p>(f) <u>the concentration of total suspended solids in the discharge shall not exceed:</u></p> <p>(i) <u>50g/m³ where the discharge enters a site or habitat identified in Schedule A (outstanding water bodies), Schedule C</u></p>	<p>Requests an exclusion for new and upgraded telecommunications facilities.</p>		<p>rules to impervious surfaces in rural environments. The water quality standards are appropriate but the 1000m² area limit is not relevant for regionally significant infrastructure projects on large sites (such as wind farms) in the rural environment;</p> <p>Decision requested: Allow S41.007 by excluding new and upgraded telecommunications facilities and regionally significant infrastructure in any rural zone as well as telecommunications facilities and by limiting the applicability of the rule to development located in urban environments or deleting the 1000m² area limit and/or amending the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p>Transpower NZ Ltd S177.058</p> <p>Notes that Rule WH.R11 [presumably P.R11] captures new impervious surfaces at high risk industrial or trade premises (and therefore seeks inclusion of these in Rule R11). Considers it necessary to provide for new and redeveloped impervious surfaces as permitted or controlled activities under Rules R5, R6 and .R7 subject to appropriate conditions.</p>	<p>Support in part</p>	<p>Meridian agrees that there should be permitted activity provision for high risk industrial or trade premises, if these are to be addressed as a separate category of activity distinct from or a subset of regionally significant infrastructure (and Meridian notes that these are present within parts of its existing wind farms). Meridian opposes reliance on discretionary activity Rule P.R11 for discharges from high risk industrial or trade premises because permitted activity standards can be set for these. The area limit of 1000m² on a per property per 12 month period basis is not relevant for large scale regionally significant infrastructure in the rural environment;</p> <p>Decision requested: Allow S177.058 but delete the proposed area limit of 1000m² per property in any consecutive 12-month period.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>(mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites), or Schedule H1 (contact recreation), or</u></p> <p>(ii) <u>100g/m3 where the discharge enters any other water, and where the discharge is not via an existing or new local authority stormwater network:</u></p> <p>(g) <u>the discharge shall not cause any erosion of the channel or banks of the receiving water body or the coastal marine area, and</u></p> <p>(h) <u>the discharge shall not give rise to the following effects beyond the zone of reasonable mixing:</u></p> <p>(i) <u>the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials, or (</u></p> <p>(ii) <u>any conspicuous change in the colour, or</u></p> <p>(iii) <u>a decrease in water clarity of more than 1. 20% in a River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or 2. 30% in any other river, or</u></p>	<p>Firth Industries Limited S207.027</p> <p>Considers new or redeveloped impervious surfaces for high risk industrial or trade premises should be provided for in this permitted activity rule. Requests amendment to delete the exclusion if high risk industrial or trade premises.</p>	Support in part	<p>Meridian agrees that there should be permitted activity provision for high risk industrial or trade premises, if these are to be addressed as a separate category of activity distinct from or a subset of regionally significant infrastructure (and Meridian notes that these are present within parts of its existing wind farms). Meridian opposes reliance on discretionary activity Rule WH.R11 for discharges from high risk industrial or trade premises because permitted activity standards can be set for these. The area limit of 1000m² on a per property per 12 month period basis is not relevant for large scale regionally significant infrastructure in the rural environment;</p> <p>Decision requested: Allow S207.027 but delete the proposed area limit of 1000m² per property in any consecutive 12-month period.</p>
	<p>RP Mansell, AJ Mansell and MR Mansell S217.016</p> <p>Requests amendment to the area limit to apply to an existing or future subdivided lot over a 12 month period.</p>	Oppose	<p>Meridian opposes the 1000m² area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Therefore, Meridian opposes the requested amendment that includes the proposed 1000m² limit;</p> <p>Decision requested: Disallow the amendment requested by S217.016 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m² area limit and/or amend the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>(iv) <u>any emission of objectionable odour, or</u></p> <p>(v) <u>the freshwater is unsuitable for consumption by farm animals, or</u></p> <p>(vi) <u>any significant adverse effects on aquatic life.</u></p> <p><u>Note Where a property connects to a local authority stormwater network, additional connection requirements and authorisations may be required by the network utility operator.</u></p>	<p>Kāinga Ora S257.058</p> <p>Opposes the 1000m² area limit because it will impose a considerable regulatory burden and cost not adequately assessed within the s. 32 analysis. Requests the 1000m² limit is increased to 5000m².</p>	<p>Oppose in part</p>	<p>Meridian opposes the 1000m² area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment. Meridian considers the limit is not relevant for, and should be deleted, for these activities;</p> <p>Decision requested: Disallow the amendment requested by S257.058 to the extent it conflicts with Meridian's separate request to limit the applicability of the rule to development located in urban environments or delete the 1000m² area limit and/or amend the definition of 'impervious surfaces' so that it applies to development in the urban environment as intended by the relevant policies and excludes its application to regionally significant infrastructure in the rural environment.</p>
	<p>Forest & Bird S261.176</p> <p>Considers greater Council oversight is required. Requests reclassification of activity status to controlled activity.</p>	<p>Oppose</p>	<p>Meridian considers permitted activity for discharges from high risk industrial and trade premises is appropriate and can be managed through conditions in the rule (noting that Meridian opposes the 1000m² area limit to the extent that may be applicable to renewable electricity generation as a form of regionally significant infrastructure in the rural environment);</p> <p>Decision requested: Disallow S261.176.</p>
	<p>China Forest Group Company NZ Ltd S288.106</p> <p>Considers there is confusion between definitions and their application. Requests clarification that the rule applies to urban and industrial or similar circumstances.</p>	<p>Support</p>	<p>Meridian agrees there is confusion in the provisions (in the policies and in the rules) and requests amendments to the definition of 'impervious surfaces' to exclude regionally significant infrastructure in the rural environment or to limit the applicability of the rule to urban situations or high risk industrial or trade premises;</p> <p>Decision requested: Allow S288.106.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>Rule P.R10: Stormwater from new and redeveloped impervious surfaces – discretionary activity</u> <u>The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule P.R5, or a controlled activity under Rule P.R6 or Rule P.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions are met:</u></p> <p>(a) <u>the resource consent application includes a Stormwater Impact Assessment prepared in accordance with Schedule 29 (impact assessment), and</u></p> <p>(b) <u>if the proposal is for greenfield development a financial contribution is paid for the purpose of offsetting the adverse effects of residual stormwater contaminants. The level of contribution and when it is required is set out in Schedule 30 (financial contributions).</u></p>	<p>Wellington City Council S33.115</p> <p>Considers the proposed framework will result in consenting overlap with WCC functions. Requests deletion of Rule P.R10.</p>	Support in part	<p>Meridian considers the rule should not apply to regionally significant infrastructure in the rural environment;</p> <p>Decision requested: Allow SS33.115.</p>
	<p>Transpower NZ Ltd S177.061</p> <p>Considers high risk industrial or trade premises should be provided for as permitted activities. Opposes and seeks deletion of mandatory financial contributions.</p>	Support in part	<p>Meridian agrees that discharges from high risk industrial or trade premises should be provided for as permitted activities subject to conditions. Meridian does not consider Rules WH.R5 and WH.R11 should apply to regionally significant infrastructure in rural environments;</p> <p>Decision requested: Allow S177.061 in part by amending Rule P.R10 as follows:</p> <p>'The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that does not comply with the conditions of is not permitted by Rule Rules P.R2, P.R3, P.R4 or P.R5, or is not authorised by a controlled activity under Rule P.R6 or Rule PH.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions are is met...'</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Department of Corrections S248.059</p> <p>Considers high risk industrial or trade premises should be provided for as permitted activities. Opposes and seeks deletion of mandatory financial contributions.</p>	Support in part	<p>Meridian agrees that discharges from high risk industrial or trade premises should be provided for as permitted activities subject to conditions. Meridian does not consider Rules WH.R5 and WH.R11 should apply to regionally significant infrastructure in rural environments;</p> <p>Decision requested: Allow S248.059 in part by amending Rule P.R10 as follows:</p> <p>'The use of land for the creation of new, or redevelopment of existing impervious surfaces (including greenfield development and redevelopment of existing urbanised property) and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that does not comply with the conditions of is not permitted by Rule Rules P.R2, P.R3, P.R4 or P.R5, or is not authorised by a controlled activity under Rule P.R6 or Rule PH.R7, or prohibited under P.R12 is a discretionary activity provided the following conditions are is met...'</p>
<p><u>Rule P.R11: All other stormwater discharges – non-complying activity</u> <u>The:</u></p> <p>(a) <u>discharge of stormwater onto or into land, including where contaminants may enter groundwater, that is not permitted by Rule P.R2, or</u></p> <p>(b) <u>discharge of stormwater into water or onto or into land where it may enter a surface water body or coastal water, that is not permitted by Rule P.R3, or a restricted</u></p>	<p>Transpower NZ Ltd S177.062</p> <p>Considers the move to non-complying activity status, for minor breaches of rule conditions, is not sufficiently justified in the s. 32 report. Requests amendment to discretionary activity.</p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Allow S177.062.</p>
	<p>RP Mansell, AJ Mansell & MR Mansell S217.019</p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>discretionary activity under Rules P.R.8, or</u></p> <p>(c) <u>discharge of stormwater from a high risk industrial or trade premise that is not permitted by Rule P.R.4, or the use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater from a high risk industrial or trade premise that does not meet the conditions of Rule P.R.10, or</u></p> <p>(d) <u>use of land for the creation of new or redevelopment of existing impervious surfaces and the associated discharge of stormwater into water or onto or into land where it may enter water, that is not permitted by Rule P.R.5, or a controlled activity under Rule P.R.6 or P.R.7, or a discretionary activity under Rule P.R.9, or a prohibited activity under PR.12, is a non-complying activity.</u></p>	<p>Considers discretionary activity status is more appropriate and requests retention of existing (operative NRP) effects management approach for managing stormwater discharges. Requests amendment to discretionary activity status.</p>		<p>Decision requested: Allow S217.019.</p>
	<p>Department of Corrections S248.060</p> <p>Considers discretionary activity status is more appropriate and requests retention of existing (operative NRP) effects management approach for managing stormwater discharges. Requests amendment to discretionary activity status.</p>	Support	<p>Meridian agrees the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Allow S248.060.</p>
	<p>Forest & Bird S261.182</p> <p>Supports Rule P.R.11 and requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Disallow S261.182.</p>
	<p>KiwiRail Holdings Ltd S279.019</p> <p>Supports Rule P.R.11 and requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is unnecessary and inappropriate for minor breaches of rule conditions;</p> <p>Decision requested: Disallow S279.019</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>Rule P.R16: Vegetation clearance on highest erosion risk land – permitted activity</u> <u>Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body is a permitted activity provided the following conditions are met:</u></p> <p>(a) <u>the vegetation clearance is:</u></p> <p>(i) <u>to implement an action in the erosion risk treatment plan for the farm, or</u></p> <p>(ii) <u>for the control of pest plants, and</u></p> <p>(b) <u>debris from the vegetation clearance is not placed where it can enter a surface water body.</u></p>	<p>Transpower NZ Ltd S177.064</p> <p>Notes regular vegetation clearance is required to prevent vegetation encroaching on National Grid transmission lines and structures. Requests addition of a clause permitting vegetation clearance of up to 200 m² in any consecutive 12 month period or for the purpose of operating or maintaining the National Grid.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S177.064 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p>Wairarapa Federated Farmers S193.143</p> <p>Requests deletion of Rule P.R16.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S193.143 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Winstone Aggregates S206.084</p> <p>Considers the rule is limiting because it does not allow for vegetation clearance of the specified land for most uses. Considers the existing approach of operative NRP Rules R104 to R107 is more fit for purpose. Requests addition of a clause permitting vegetation clearance of up to 200 m² in any consecutive 12 month period.</p>	Support in part	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S206.084 in part by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p>EDS S222.099</p> <p>Requests the rule be made a controlled activity, or amend the standards to avoid sedimentation of receiving waterbodies and the coastal marine area.</p>	Oppose	<p>Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), considers permitted activity status is appropriate. Meridian also considers the limits in operative Rule R104 or an area limit for regionally significant infrastructure consistent with the limits in Rule R104 is appropriate;</p> <p>Decision requested: Disallow S222.099.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Best Farm Ltd S254.017</p> <p>Haas concerns about the accuracy of the mapping. Considers the limit to 200m² for pest control as a controlled activity under Rule P.R17 is too low given earthworks are permitted up to 3000m².</p>	Support	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p> <p>Decision requested: Allow S254.017 by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.</p>
	<p>Kāinga Ora S257.062</p> <p>Generally supports the intent of the rule but seeks a threshold for (other) vegetation clearance as a permitted activity.</p>	Support	<p>Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
			Decision requested: Allow S257.062 by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.
	Forest & Bird S261.187 Considers additional standards are required, including area limit of 200m ² and minimum setback from water bodies.	Oppose in part	For the reasons explained above, Meridian considers the area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP; Decision requested: Disallow S261.187.
	NZTA S275.029 Notes that there is a need to remove vegetation to provide a safe network. The requirement to obtain consent is overly onerous. Considers there should be permitted activity provision and a restricted discretionary activity default.	Support	Vegetation clearance is also required routinely for regionally significant infrastructure, in addition to the purposes permitted by Rule P.R16 (including to allow for vegetation clearance associated with upgrading activities). Meridian notes that the operative NRP rule (R104) provides for vegetation clearance of up to 2 ha in any 12 month period and, reiterating the further submission point seeking retention of operative NRP rules (S193.042), requests retention of the limits in operative Rule R104 or a larger area for regionally significant infrastructure consistent with the limits in Rule R104; Decision requested: Allow S275.029 by providing for vegetation clearance other than for the limited purposes currently listed in Rule P.R16 but increase the area permitted to be cleared to be consistent with operative Rule R104.
	KiwiRail Holdings Ltd S279.020	Oppose	For the reasons explained above, Meridian considers the area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP;

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	Supports the intent of the provision and requests retention as notified.		Decision requested: Disallow S279.020.
<p><u>Rule P.R17: Vegetation clearance on highest erosion risk land – controlled activity</u> <u>Vegetation clearance on highest erosion risk land (woody vegetation), of more than a total area of 200m² per property in any consecutive 12-month period, and any associated discharge of sediment to a surface water body is a controlled activity provided an erosion and sediment management plan has been prepared in accordance with Schedule 33 (vegetation clearance plan) and submitted with the application for resource consent under this Rule.</u></p> <p><u>Matters of control</u> 1. <u>The content of the erosion and sediment management plan, including the actions, management practices and mitigation measures necessary to ensure that discharge of sediment will not exceed that which occurred from the land prior to the vegetation clearance occurring</u> 2. <u>The area, location and method of vegetation clearance</u> 3. <u>Stabilisation and rehabilitation of the area cleared</u></p>	<p>Transpower NZ Ltd S177.065</p> <p>Notes that NESETA would prevail. Requests amendment to insert a matter of control addressing clearance from the National Grid.</p>	Oppose in part	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased for regionally significant infrastructure to match the permitted activity R104 limit in the operative NRP. This would necessitate a consequential change to the threshold area specified in Rule P.R17;</p> <p>Decision requested: Allow S177.065 only to the extent consistent with Meridian’s requested relief on Rule P.R16 and amend the area limit to match the area limit of Rule P.R16 (being the area limit of operative Rule R104), particular for regionally significant infrastructure.</p>
	<p>Wairarapa Federated Farmers S193.144</p> <p>Requests retention of operative NRP rule and deletion of Rule P.R17.</p>	Support in part	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate amendment of the threshold area specified in Rule P.R17;</p> <p>Decision requested: Allow S193.144 by amending Rule P.R16 to match the limits in operative NRP Rule R104 and make consequential amendments to Rule P.R17.</p>
	<p>Winstone Aggregates S206.085</p> <p>Opposes the mapping but supports the rule and requests its retention.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit (in Rule P.R16) should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of Rule P.R17;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>4. The monitoring, record keeping, reporting and information provision requirements for the holder of the resource consent (including auditing of information) to demonstrate and/or monitor compliance with the resource consent and the erosion and sediment management plan</u></p> <p><u>5. The timing, frequency and requirements for review, audit and amendment of the erosion and sediment management plan</u></p> <p><u>6. The time and circumstances under which the resource consent conditions may be reviewed</u></p>			Decision requested: Disallow S206.085.
	<p>EDS S222.100</p> <p>Requests making the provision for vegetation clearance greater than 200m² a restricted discretionary or discretionary activity rule.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. This would necessitate consequential amendment of Rule P.R17. Meridian considers the controlled activity default provision is appropriate;</p> <p>Decision requested: Disallow S222.100, allow general vegetation clearance as a permitted activity with limits matching those in operative Rule R104 and make consequential amendments to Rule P.R17 to increase the threshold area to match Rule P.R16.</p>
	<p>Porirua City Council S240.075</p> <p>Supports and requests retention as notified.</p>	Oppose	<p>For the reasons explained above, Meridian considers Rule P.R17 requires amendment;</p> <p>Decision requested: Disallow S240.075.</p>
	<p>Best Farm Ltd S254.018</p> <p>Considers the area limit is too low as a controlled activity given that earthworks are permitted up to 3000m².</p>	Support in part	<p>Meridian agrees the controlled activity threshold (and therefore also the permitted activity limit) is too low and considers it should be amended to match the operative NRP rules (R104 and R106 in particular);</p> <p>Decision requested: Allow S254.018 by increasing the permitted activity area limit to match the operative NRP Rule R104 limit and making consequential amendments to Rule P.R17 to reflect this increase.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Kāinga Ora S257.063</p> <p>Supports the intent of the rule but considers the 200m² threshold too onerous. Requests increasing the area limit before consent is required as a controlled activity</p>	Support and oppose in part	<p>Meridian notes that there is no permitted activity rule currently providing for vegetation clearance for purposes other than those listed in Rule P.R16. This means that vegetation clearance up to 200m² for other purposes requires consent as a discretionary activity. Meridian agrees the 200m² limit is unduly onerous and considers it should be increased, particularly for vegetation clearance associated with regionally significant infrastructure, as a permitted activity and that the area should match the area limit of operative NRP Rule R104. Meridian supports the proposed controlled activity provision for vegetation clearance of areas greater than the permitted activity limit (provide the permitted activity limit is increased to match Rule R104).</p> <p>Decision requested: Allow S257.063 by increasing the permitted activity Rule P.R16 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule P.R17 to reflect this.</p>
	<p>Forest & Bird S261.188</p> <p>Considers the inability to refuse consent is inappropriate. Requests amendment to discretionary activity or restricted discretionary activity with 'adverse effects on the environment' as a matter of discretion.</p>	Oppose	<p>For the reasons explained above, Meridian considers the permitted activity area limit is too small and should be increased (particularly for regionally significant infrastructure) to match the permitted activity R104 limit in the operative NRP. Meridian opposes a discretionary activity default approach where the threshold area is currently so small.</p> <p>Decision requested: Disallow S261.188.</p>
	<p>NZTA S275.030</p> <p>Suggests a permitted activity status for vegetation clearance to provide for a safe</p>	Support in part	<p>Meridian agrees that permitted activity provision should be made for purposes other than those currently listed in Rule P.R16. The permitted activity rule should provide for vegetation clearance associated with regionally significant infrastructure and the limits should match those in operative</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	transport network, subject to performance standards.		NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds; Requested decision: Allow S275.030 by increasing the permitted activity Rule P.R16 area limit to match operative NRP Rule R104 and amend the threshold limit of Rule P.R17 to reflect this.
	KiwiRail Holdings Ltd S279.008 Supports the intent of the rule and requests retention as notified.	Oppose	Meridian considers that permitted activity provision should be made for purposes other than those currently listed in Rule P.R16. The permitted activity rule should provide for vegetation clearance for all regionally significant infrastructure and the limits should match those in operative NRP Rule R104, with consequential amendments to the rule framework to adopt those permitted activity thresholds; Requested decision: Disallow S279.008.
<u>Rule P.R18: Vegetation clearance – discretionary activity</u> <u>Vegetation clearance on highest erosion risk land (woody vegetation) and any associated discharge of sediment to a surface water body that does not comply with one or more of the conditions of Rule P.R16 or P.R17 is a discretionary activity.</u>	Wairarapa Federated Farmers S193.145 Requests retention of operative NRP rule and deletion of Rule P.R18.	Support	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals; Decision requested: Allow S193.145.
	Porirua City Council S240.076 Supports and requests retention as notified.	Oppose	Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals; Decision requested: Disallow S240.076 and reinstate operative NRP Rule R106.

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Forest & Bird S261.189</p> <p>Supports Rule WH.R19 and requests retention as notified.</p>	Oppose	<p>Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;</p> <p>Decision requested: Disallow S261.189 and reinstate operative NRP Rule R106.</p>
	<p>KiwiRail Holdings Ltd S279.022</p> <p>Supports the intent of Rule WH.R19 and requests retention as notified.</p>	Oppose	<p>Meridian supports the restricted discretionary activity default Rule R106 for renewable energy generation that was negotiated through mediation of NRP appeals;</p> <p>Decision requested: Disallow S279.022 and reinstate operative NRP Rule R106.</p>
<p><u>Rule P.R22: Earthworks – permitted activity</u> Earthworks is a permitted activity, provided the following conditions are met:</p> <p>(a) <u>the earthworks are to implement an action in the erosion risk treatment plan for the farm, or</u></p> <p>(b) <u>the earthworks are to implement an action in the farm environment plan for the farm, or</u></p> <p>(c) <u>the area of earthworks does not exceed 3,000m² per property in any consecutive 12-month period, and</u></p> <p>(d) <u>the earthworks shall not occur within 5m of a surface water body or the coastal marine area, except for earthworks undertaken in association with Rules R122, R124,</u></p>	<p>Wellington City Council S33.121</p> <p>Considers clause (g) cannot be met. Requests deletion of (g) and insertion of threshold area for erosion and sediment control measures.</p>	Support	<p>Meridian agrees that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S33.121.</p>
	<p>Fulton Hogan Ltd S43.028</p> <p>Considers the rule should include associated discharges and requests amendment to clause (g) to insert a 25m² threshold area over which no discharge is permitted.</p>	Support and oppose in part	<p>Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and opposes in its entirety clause (g);</p> <p>Decision requested: Allow S43.028 in part by providing for associated discharges in the chapeau to the rule and deleting clause (g).</p>
	<p>Jo McCready S94.012</p>	Support	<p>Meridian considers that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S94.012 by deleting clause (g).</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>R130, R131, R134, R135, and R137, and</u></p> <p>(e) <u>soil or debris from earthworks is not placed where it can enter a surface water body or the coastal marine area, including via a stormwater network, and</u></p> <p>(f) <u>the area of earthworks must be stabilised within six months after completion of the earthworks, and</u></p> <p>(g) <u>there is no discharge of sediment from earthworks and/or flocculant into a surface water body, the coastal marine area, or onto land that may enter a surface water body or the coastal marine area, including via a stormwater network, and</u></p> <p>(h) <u>erosion and sediment control measures shall be used to prevent a discharge of sediment where a preferential flow path connects with a surface water body or the coastal marine area, including via a stormwater network.</u></p>	<p>Considers the conditions are arbitrary with no factual basis. Also considers the size of earthworks had no relation to property size and the weather window is irrelevant (bad weather can occur at any time of year). Requests delete these conditions.</p>		
	<p>Wellington Water Ltd S151.130</p> <p>Notes earthworks activities undertaken by Wellington Water with minor effects would be unable to meet the permitted activity conditions of proposed Rule WH.R22 including minor repairs and maintenance of three waters infrastructure. Notes that this proposed rule may mean that hundreds of resource consent applications would be required per annum for minor earthworks activities associated with burst pipe repairs. Requests amendment to reinstate the exemptions for certain earthworks as still provided for in other Whaitua.</p>	Support	<p>Meridian agrees the deletion of the operative NRP exemptions is problematic for regionally significant infrastructure;</p> <p>Decision requested: Allow S151.130 to the extent consistent with Meridian's other further submission points.</p>
	<p>Transpower NZ Ltd S177.067</p> <p>Considers clause (g) is inappropriate as it conflicts with the minor discharges rule. Requests deletion of (g).</p>	Support	<p>Meridian agrees that clause (g) is unachievable and unreasonable and also considers that the chapeau of the rule needs to provide for associated discharges (including discharges of sediment and/or flocculant);</p> <p>Decision requested: Allow S177.067 by deleting (g) and by providing for associated discharges in the chapeau to the rule.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>David McKeivitt S190.007</p> <p>Considers discharge of sediment from earthworks is unavoidable even with sediment controls. Requests amendment of clause (g) to refer to discharge that is not treated by erosion and sediment control measures.</p>	Support in part	<p>Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;</p> <p>Decision requested: Allow S190.007 by deleting clause (g).</p>
	<p>Wairarapa Federated Farmers S193.149</p> <p>Requests deletion of Rule P.R22.</p>	Support in part	<p>Meridian considers the rule should include associated discharges (including discharges of sediment and/or flocculant) and considers clause (g) is impractical;</p> <p>Decision requested: Allow S193.149 in part by providing for associated discharges in the chapeau to the rule and deleting clause (g).</p>
	<p>Winstone Aggregated S206.087</p> <p>Considers the rule should include associated discharges and requests deletion of clause (g).</p>	Support in part	<p>Meridian agrees the rule should include associated discharges (including discharges of sediment and/or flocculant) and considers clause (g) is impractical, unachievable and unreasonable;</p> <p>Decision requested: Allow S206.087.</p>
	<p>Greater Wellington Regional Council S238.030</p> <p>Considers the rule should apply to all earthworks (not just those intended to implement an erosion risk treatment plan).</p>	Oppose in part	<p>Meridian opposes the inclusion of clause (g) in GWRC's requested amendments;</p> <p>Decision requested: Disallow S238.030 in part by deleting clause (g) (re-numbered (e) in S238.030).</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Best Farm Ltd S254.019</p> <p>Considers requiring no discharge of sediment from earthworks is a physical impossibility. Requests deletion of clause (g).</p>	Support	<p>Meridian agrees clause (g) is impractical;</p> <p>Decision requested: Allow S254.019.</p>
	<p>The Fuel Companies S258.044</p> <p>Considers clause (g) sets a zero tolerance approach and requests amendment to refer to best practice erosion and sediment control measures.</p>	Support in part	<p>Meridian agrees that clause (g) is impractical, unachievable and unreasonable and should be deleted;</p> <p>Decision requested: Allow S258.044 by deleting clause (g).</p>
	<p>NZTA S275.034</p> <p>Considers the clause (g) limit of no discharge is unworkable and requests amendment to provide for some sediment and/or flocculant discharge where appropriate sediment control methods are in place.</p>	Support in part	<p>Meridian agrees that clause (g) is unachievable and unreasonable;</p> <p>Decision requested: Allow S275.034 by deleting clause (g).</p>
	<p>Civil Contractors NZ S285.032</p> <p>Considers many earthworks activities undertaken have significant public benefits but would be unable to comply with the standards of Rule P.R22. Requests amendment to reinstate</p>	Support	<p>Meridian agrees that some of the standards in the rule are impractical or unachievable;</p> <p>Decision requested: Allow S285.032.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	the exemptions for certain earthwork activities in the operative NRP.		
<p><u>Rule P.R23: Earthworks – restricted discretionary activity</u> <u>Earthworks and the associated discharge of sediment and/or flocculant into a surface water body or coastal water, or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R22 is a restricted discretionary activity, provided the following conditions are met:</u></p> <p>(a) <u>the concentration of total suspended solids in the discharge from the earthworks shall not exceed 100g/m³, except that, if at the time of the discharge the concentration of total suspended solids in the receiving water at or about the point of discharge exceeds 100g/m³, the discharge shall not, after the zone of reasonable mixing, decrease the visual clarity in the receiving water by more than:</u></p> <p>(i) <u>20% in River class 1 and in any river identified as having high macroinvertebrate community health in Schedule F1 (rivers/lakes), or</u></p> <p>(ii) <u>30% in any other river, and</u></p>	<p>Summerset Group Holdings Ltd S38.034</p> <p>Opposes the requirement for non-complying activity resource consent for discharges of sediment over the winter period. Considers large rain events causing larger pulses of sediment can occur at any time. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that the related discretionary matter (8) should also be deleted;</p> <p>Decision requested: Allow S38.034 by deleting clause (b) and discretionary matter (8).</p>
	<p>Chorus New Zealand, Connexa Limited, Aotearoa Towers Group, One New Zealand Group Limited, Spark New Zealand S41.009</p> <p>Telecommunications works are necessarily carried out year-round. Considers having to apply for consents to undertake these activities during winter will add significant costs and delays in the provision of telecommunication facilities. Winter earthworks should be dealt with through conditions of consent. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that the related discretionary matter (8) should also be deleted;</p> <p>Decision requested: Allow S41.009 by deleting clause (b) and discretionary matter (8).</p>
	<p>Fulton Hogan Ltd S43.029 and S43.030</p> <p>Considers there are many instances where earthworks can be undertaken without adverse effects during winter months. Considers the rule</p>	Support and oppose in part	<p>Meridian agrees with the reasons for S43.029 and S43.030 but does not agree with the proposed amendment. Meridian also considers the related discretionary matter (8) should also be deleted;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p>(b) <u>earthworks shall not occur between 1st June and 30th September in any year.</u></p> <p><u>Matters for discretion</u></p> <p><u>1. The location, area, scale, volume, duration and staging and timing of works</u></p> <p><u>2. The design and suitability of erosion of sediment control measures including consideration of hazard mitigation and the risk of accelerated soil erosion associated the staging of works and progressive stabilisation</u></p> <p><u>3. The placement and treatment of stockpiled materials on the site, including requirements to remove material if it is not to be reused on the site</u></p> <p><u>4. The proportion of un stabilised land in the catchment</u></p> <p><u>5. The adequacy and efficiency of stabilisation devices for sediment control</u></p> <p><u>6. Any adverse effects on:</u></p> <p>(i) <u>groundwater, surface water bodies and their margins, particularly surface water bodies within sites identified in Schedule A (outstanding water bodies), Schedule B (Ngā Taonga Nui a Kiwa), Schedule C (mana whenua), Schedule F (ecosystems and habitats with indigenous biodiversity), Schedule H (contact recreation and Māori</u></p>	<p>is out of step with Policy P28 and is more stringent than the policy directs. Concerned with the cost implications for trivial environmental gains. Requests amendment to (b) to provide for small scale earthworks with a site specific winter earthworks plan and retention of prohibition on winter work for earthworks over 3000m².</p>		<p>Decision requested: Disallow S43.029 and S43.030 and delete clause (b) and discretionary matter (8).</p>
	<p>Wellington Water Ltd S151.131</p> <p>Considers provision should be made for an exemption from clause (b) for regionally significant infrastructure to reflect the large volume of earthwork that needs to be undertaken.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted. Meridian would support a separate restricted discretionary activity rule for large scale earthworks for regionally significant infrastructure;</p> <p>Decision requested: Allow S151.131.</p>
	<p>Gillies Group Management Ltd S161.040</p> <p>Opposes the requirement for non-complying activity consent for winter earthworks. Notes that large storm events can occur throughout the year. Considers current approach to managing winter earthworks is effective. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.</p> <p>Decision requested: Allow S161.040.</p>
	<p>Pukerua Holdings Ltd S165.040</p> <p>Opposes the requirement for non-complying activity consent for winter earthworks. Notes</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.</p> <p>Decision requested: Allow S165.040.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>customary use) or Schedule I (important trout fishery rivers and spawning waters)</u></p> <p>(ii) <u>group drinking water supplies and community drinking water supplies</u></p> <p>(iii) <u>maori, water quality (including water quality in the coastal marine area), aquatic and marine ecosystem health, aquatic and riparian habitat quality, indigenous biodiversity values, mahinga kai and critical life cycle periods for indigenous aquatic species</u></p> <p>(iv) <u>the natural character of lakes, rivers, natural wetlands and their margins and the coastal environment</u></p> <p>(v) <u>natural hazards, land stability, soil erosion, sedimentation and flood hazard management including the use of natural buffers</u></p> <p><u>7. Duration of the consent</u></p> <p><u>8. Preparation required for the close-down period (from 1st June to 30th September each year) and any maintenance activities required during this period</u></p> <p><u>9. Monitoring and reporting requirement</u></p>	<p>that large storm events can occur throughout the year. Requests deletion of clause (b).</p>		
	<p>Koru Homes NZ Ltd S169.035</p> <p>Opposes the requirement for non-complying activity consent for winter earthworks. Notes that large storm events can occur throughout the year. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.</p> <p>Decision requested: Allow S169.035.</p>
	<p>Arakura Plains Development Ltd S173.040</p> <p>Opposes the requirement for non-complying activity consent for winter earthworks. Notes that large storm events can occur throughout the year. Requests deletion of clause (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary and that clause (b) and related discretionary matter (8) should be deleted.</p> <p>Decision requested: Allow S173.040.</p>
	<p>Transpower NZ Ltd S177.068</p> <p>Considers the rule should provide for associated discharges (including discharges of sediment and/or flocculant). Opposes non-complying activity status for winter earthworks and requests deletion of clause (b) and related discretionary matter (8).</p>	Support	<p>Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S177.068.</p>
	<p>David McKevitt S190.008</p>	Support in part	<p>Meridian agrees clause (b) is unreasonable and unnecessary;</p> <p>Decision requested: Allow S190.008 by deleting clause (b) and related discretionary matter (8).</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	Opposes the blanket restriction on winter earthworks. Requests amendment to provide for winter earthworks in specified circumstances.		
	Wairarapa Federated Farmers S193.150 Requests retention of operative NRP rule.	Support in part	Meridian agrees clause (b) is unreasonable and unnecessary; Decision requested: Allow S193.150 and retain the rules for earthworks that were negotiated through mediation of the NRP or, as alternative relief, delete clause (b) and related discretionary matter (8).
	Winstone Aggregates Ltd S206.088 Considers the rule effectively prohibits earthworks over winter months. Considers there is insufficient evidence to support this. Opposes non-complying activity status for winter earthworks and requests deletion of clause (b) and related discretionary matter (8).	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary; Decision requested: Allow S206.088.
	RP Mansell, AJ Mansell & MR Mansell S217.021 Considers the shut down period for winter earthworks is onerous and unnecessary. Requests deletion of winter shut down requirements.	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary; Decision requested: Allow S217.021 and delete clause (b) and related discretionary matter (8).
	Cuttriss Consultants Ltd S219.031	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	Refers to submission point on equivalent Rule WH.P23 and opposes the requirement for non-complying activity resource consent to undertake winter earthworks.		Decision requested: Allow S219.031 and delete clause (b) and related discretionary matter (8).
	EDS S222.106 Requests the rule is made a discretionary activity.	Oppose	Restricted discretionary activity status provides sufficient rigour to address likely environmental effects; Decision requested: Disallow S222.106.
	Orogen Ltd S239.019 Considers non-complying activity status for winter earthworks is inappropriate and requests deletion of clause (b).	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary; Decision requested: Allow S239.019 and delete related discretionary matter (8).
	Porirua City Council S240.081 Considers large storm events causing larger pulses of sediment discharges can occur any time throughout the year. Requests deletion of clause (b).	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary; Decision requested: Allow S240.081 and delete related discretionary matter (8).
	Carrus Corporation Ltd S247.031 Refers to submission on Rule WH.R23 and opposes non-complying activity status for winter earthworks.	Support	Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary; Decision requested: Allow S247.031 by deleting clause (b) and related discretionary matter (8).

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Department of Corrections S248.065</p> <p>Considers the rule should provide for associated discharges (including discharges of sediment and/or flocculant). Opposes non-complying activity status for winter earthworks and requests deletion of clause (b) and related discretionary matter (8).</p>	Support	<p>Meridian agrees the rule should provide for associated discharges and agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S248.065.</p>
	<p>Thames Pacific S252.030</p> <p>Refers to submission point on Rule WH.R23 and opposes non-complying activity status for winter earthworks.</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S252.030 by deleting clause (b) and delete related discretionary matter (8).</p>
	<p>Best Farm Ltd S254.020</p> <p>Does not support the winter shutdown period. Considers it is possible and reasonable to work into June or start in September. Requests deletion of the winter shutdown requirement.</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S254.020 by deleting clause (b) and delete related discretionary matter (8).</p>
	<p>Woodridge Holdings Ltd S255.074</p> <p>Considers Rule P.R23 repeats Rule WH.R24 and is unnecessary. Requests combining the rules into one rule.</p>	Neutral	<p>Meridian considers the restriction on winter earthworks is unreasonable and unnecessary, regardless of how the rules are organised;</p> <p>Decision requested: Allow S255.074 only to the extent consistent with Meridian's other requested relief on Rule P.R23 (being deletion of clause (b) and related discretionary matter (8)).</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Kāinga Ora S257.065</p> <p>Opposes condition (b) and the resulting escalation to a non-complying activity. Requests deletion of (b).</p>	Support	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Allow S257.065 and delete related discretionary matter (8).</p>
	<p>The Fuel Companies S258.045</p> <p>Considers the rule should focus on best practice erosion and sediment control. Requests amendments to this effect but retains proposed clause (b).</p>	Oppose in part	<p>Meridian considers the clause (b) restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Disallow S258.045 in part by deleting clause (b) and related discretionary matter (8).</p>
	<p>Forest & Bird S261.194</p> <p>Requests the rule is reclassified a discretionary activity.</p>	Oppose	<p>Restricted discretionary activity status provides sufficient rigour to address likely environmental effects;</p> <p>Decision requested: Disallow S261.194.</p>
	<p>KiwiRail Holdings Ltd S279.024</p> <p>Supports the intent of the provision and requests retention as notified.</p>	Oppose in part	<p>Meridian considers the clause (b) restriction on winter earthworks is unreasonable and unnecessary;</p> <p>Decision requested: Disallow S279.024 in part by deleting clause (b) and related discretionary matter (8).</p>
	<p>Civil Contractors NZ S285.033</p> <p>Strongly opposes and considers the winter earthworks shutdown is inappropriate.</p>	Support in part	<p>Meridian agrees the restriction on winter earthworks is unreasonable and unnecessary. Meridian's preference is that clause (b) and related discretionary matter (8) are deleted;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	Requests amendment of clause (b) to ensure sufficient and appropriate exemptions exist to provide some ability for earthworks where potential sediment can be well managed and controlled.		Decision requested: Allow S285.033 by deleting clause (b) and related discretionary matter (8).
<u>Rule P.R24: Earthworks – non-complying activity</u> Earthworks, and the associated discharge of sediment into a surface water body or coastal water or onto or into land where it may enter a surface water body or coastal water, including via a stormwater network, that does not comply with Rule P.R23 is a non-complying activity.	Wellington City Council S33.123 Considers the rule is consistent with WCC's PDP and requests retention as notified.	Oppose in part	Meridian considers the restriction on winter earthworks and default to non-complying activity rule is unreasonable and unnecessary; Decision requested: Disallow S33.123 and provide for winter works as a restricted discretionary activity.
	Fulton Hogan Ltd S43.030 Considers the non-complying activity status is too restrictive given the number of activities that would be captured under Rule P.R24. Requests amendment to provide for low level earthworks activities.	Support in part	Meridian agrees the non-complying activity status is not necessary or appropriate and agrees that provision should be made for winter earthworks as a restricted discretionary activity; Decision requested: Allow S43.030 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.
	Transpower NZ Ltd S177.069 Considers non-complying activity status for minor breaches of rule conditions is inappropriate for earthworks associated with the National Grid. Requests amendment to discretionary activity.	Support in part	Meridian agrees the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity; Decision requested: Allow S177.069 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Wairarapa Federated Farmers S193.151</p> <p>Requests retention of the operative NRP rule and deletion of Rule P.R24.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Allow S193.151 or, as alternative relief, provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>Winstone Aggregates S206.089</p> <p>Opposes non-complying activity status. Considers the rule, in conjunction with Policy P.P29, effectively prohibits winter earthworks. Requests amendment to discretionary activity status.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Allow S206.089 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>RP Mansell, AJ Mansell & MR Mansell S217.022</p> <p>Generally supports the effects management approach but considers discretionary activity is more appropriate than non-complying activity status. Requests amendment to discretionary activity.</p>	Support in part	<p>Meridian agrees the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Allow S217.022 in part by providing for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Porirua City Council S240.082</p> <p>Supports in principle and requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Disallow S240.082 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>Department of Corrections S248.066</p> <p>Considers non-complying activity status for earthworks that do not comply with Rule P.R23 is onerous and unnecessary. Non-complying activity status for minor breaches of rule conditions is problematic for bundled consents which results in a high degree of uncertainty. Requests amendment to discretionary activity.</p>	Support in part	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Disallow S248.066 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>Woodridge Holdings Ltd S255.075</p> <p>Considers Rule P.R24 repeats Rule WH.R25 and requests combining the rules into one rule.</p>	Neutral	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Allow S255.075 only to the extent consistent with Meridian's requested relief (provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions).</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>The Fuel Companies S258.046</p> <p>Supports Rule P.R24 provided changes sought are made to Rule P.R23. Requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Disallow S258.046 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>Forest & Bird S261.195</p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Disallow S261.195 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>
	<p>KiwiRail Holdings Ltd S279.025</p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Meridian considers the non-complying activity status is not necessary or appropriate and considers provision should be made for winter earthworks as a restricted discretionary activity;</p> <p>Decision requested: Disallow S279.025 and provide for winter earthworks as a restricted discretionary activity, subject to effects based conditions, with a discretionary activity default rule for non-compliance with conditions.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>Rule P.R26: Farming activities on 20 hectares or more of land – permitted activity</u> <u>The use of 20 hectares or more of land on a farm for pastoral land use, arable land use, or more than 5 hectares for horticultural land use, and the associated discharge of contaminants into a surface water body or into or onto land where a contaminant may enter freshwater is a permitted activity provided the following conditions are met:</u></p> <p>(a) <u>a farm environment plan in respect of the land and associated land use is supplied to Wellington Regional Council by the date set out in Table 9.5 for the part Freshwater Management Unit in which the farm is located, and</u></p> <p>(b) <u>if the farm used for pastoral land use contains highest erosion risk land (pasture) or high erosion risk land (pasture), the farm environment plan includes an erosion risk treatment plan, that meets the requirements of Schedule 36 (farm environment plan - additional), and</u></p> <p>(c) <u>a farm environment plan certifier certifies in writing that:</u> <u>(i) the farm environment plan supplied to the Wellington Regional Council has been prepared in accordance with, and meets the</u></p>	<p>Diane Strugnell S5.012</p> <p>Considers it is important that farming in the Waitua has continued support. Requests retention as notified.</p>	<p>Oppose in part</p>	<p>Meridian opposes the requirement for re-vegetation of at least 50% of identified high erosion risk and highest erosion risk land in Schedule 36 Parts B and E that is imposed through Rule P.R26 (b);</p> <p>Decision requested: Allow S5.012 only to the extent consistent with Meridian’s requested relief on Schedule 36 (Parts B and E not applying to lawfully established renewable electricity generation activities).</p>
	<p>Donald Love S102.003</p> <p>Requests amendment to Schedule 36 B to remove the woody vegetation re-vegetation requirement.</p>	<p>Support in part</p>	<p>Meridian considers the Schedule B requirement for re-vegetation with woody vegetation has the potential to conflict with the functional and operational needs of its lawfully established wind farms and opposes the imposition of the requirement through Rule P.R26;</p> <p>Decision requested: Allow S102.003 or, as alternative relief, exempt existing renewable electricity generation activities from the re-vegetation requirements in Schedule 36 B.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p><u>requirements of Schedule Z (farm environment plan) and Schedule 36 (farm environment plan - additional), or</u> <u>(ii) where the farm environment plan is certified under section 217G of Part 9A of the RMA, that the farm environment plan meets the requirements of condition (b), and</u> (d) <u>the land use is undertaken in accordance with the farm environment plan provided under condition (a).</u></p>		
<p><u>Schedule 36: Additional requirements for Farm Environment Plans in Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua</u> <u>B Management objectives</u> <u>In addition to the management objectives described in Part B of Schedule Z, the farm environment plan must demonstrate that the measures adopted to address the identified risks will result in the revegetation of highest erosion risk land (pasture), and treatment to address erosion risks on other land including high erosion risk land (pasture), with at least 50% of highest erosion risk land (pasture), being revegetated by 30 December 2033, and the remaining highest risk erosion land (pasture) being</u></p>	<p>Diane Strugnell S5.016</p> <p>Considers various risk factors are not taken into account by the single solution. Requests deletion of the requirement for re-vegetation.</p>	Support in part	<p>Meridian considers the Schedule 36B and 36E requirements for re-vegetation with woody vegetation has the potential to conflict with the functional and operational needs of its lawfully established wind farms and seeks an exemption from the requirement, either in Schedule 36B and 36E or in the relevant rules;</p> <p>Decision requested: Allow S5.016 by providing an exemption from the re-vegetation requirements in Schedule 36B and 36E for farm land within or associated with lawfully established renewable electricity generation activities.</p>
	<p>Donald Love S102.007</p> <p>Considers it is not clear that replacing lightly stocked grassland with woody vegetation would achieve net sediment reduction. Requests</p>	Support in part	<p>Meridian considers the Schedule 36 B and 36E requirements for re-vegetation with woody vegetation has the potential to conflict with the functional and operational needs of its lawfully established wind farms and seeks an exemption from the requirement, either in Schedule 36B and 36E or in the relevant rules;</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>revegetated by 30 December 2040, unless this is not reasonably practicable, and a certifier certifies that alternative erosion control treatment over the balance of the property will result in the same level of soil loss avoidance.</u></p> <p>...</p> <p><u>E Erosion Risk Treatment Plan</u> <u>A farm environment plan for a property that contains highest erosion risk land (pasture) or high erosion risk land (pasture) must include an erosion risk treatment plan that contains the following:</u></p> <p><u>1. A programme to ensure that 50% of the total area of any highest erosion risk land (pasture) on the property is in permanent woody vegetation within 10</u></p>	<p>removal of the 50% wood vegetation re-vegetation requirement.</p>		<p>Decision requested: Allow S102.007 by deleting the requirement or, as alternative relief, provide an exemption from the re-vegetation requirements in Schedule 36 B and 36E for farm land within or associated with lawfully established renewable electricity generation activities.</p>
	<p>Wairarapa Federated Farmers S193.184</p> <p>Requests deletion of Schedule 36.</p>	<p>Support in part</p>	<p>Meridian considers the Schedule 36B and 36E requirements for re-vegetation with woody vegetation has the potential to conflict with the functional and operational needs of its lawfully established wind farms and seeks an exemption from the requirement, either in Schedule 36B and 36E or in the relevant rules;</p> <p>Decision requested: Allow S193.184 by deleting the requirement for 50% re-vegetation with woody vegetation or, as alternative relief, provide an exemption from the re-vegetation requirements in Schedule 36B and 36E for farm land within or associated with lawfully established renewable electricity generation activities.</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
<p><u>years of the farm environment plan being certified, where permanent woody vegetation:</u></p> <p>(a) <u>(a) can reasonably be expected to reach canopy cover of at least 80% per hectare within 10 years of being established, and</u></p> <p>(b) <u>(b) is not plantation forestry, and</u></p> <p>(c) <u>(c) subject to meeting (a) and (b) above, may include appropriate planted species or species that may naturally regenerate.</u></p> <p>...</p>	<p>Willowbank Trustee Ltd S204.010 and S204.011</p> <p>Opposes the requirement for revegetation of at least 50% of land by December 2033 due to practicalities. Considers it is not always possible to establish woody vegetation on pasture due to farm circumstances and that the focus should be on addressing erosion risk in an achievable and appropriate manner, which may lead to site-specific solutions rather than a 'one-size-fits-all' approach. Requests amendment to state 'where practicable' in various provisions including in Schedule 36E.</p>	<p>Support in part</p>	<p>Meridian considers the requirement for re-vegetation with woody vegetation has the potential to conflict with the functional and operational needs of its lawfully established wind farms and that this is another of the practicalities that Schedule 36 should address. Meridian seeks an exemption from the requirement, either in Schedule 36B and 36E or in the relevant rules;</p> <p>Decision requested: Allow S204.010 and S204.011 by deleting the requirement for 50% re-vegetation with woody vegetation or, as alternative relief, provide an exemption from the re-vegetation requirements in Schedule 36B and 36E for farm land within or associated with lawfully established renewable electricity generation activities.</p>
<p><u>Maps of highest erosion risk and high erosion risk Te Whanganui-a-Tara:</u></p>			
<p><u>Map 93 Highest and high erosion risk land (pasture)</u></p>	<p>PF Olsen Ltd S18.075</p> <p>Considers there is more research available to determine landslide susceptibility. Requests deletion of the mapping layer or peer review to establish its scientific validity.</p>	<p>Support in part</p>	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S18.075</p>
	<p>Wairarapa Federated Farmers S193.198</p> <p>Considers the mapping methodology is not fit for purpose. Requests deletion of the map.</p>	<p>Support in part</p>	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S193.198</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Pareraho Forest Trust S213.031</p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Disallow S213.031 and delete the map.</p>
	<p>Kāinga Ora S257.075</p> <p>Supports the identification of land but considers the maps are not readily able to be understood at a site-based level. Considers a definition (rather than mapping) is more appropriate to capture these areas of land. Requests deletion of the map and replacement with a definition to more accurately identify sites.</p>	Support in part	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S257.075</p>
	<p>Forest & Bird S261.270</p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Disallow S261.270 and delete the map.</p>
<u>Map 94 Highest erosion risk land (woody vegetation clearance)</u>			
	<p>PF Olsen Ltd S18.076</p> <p>Considers there is more research available to determine landslide susceptibility. Requests deletion of the mapping layer or peer review to establish its scientific validity.</p>	Support in part	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S18.076</p>

	Submission Points:	Support or Oppose:	Reasons and Decisions Requested:
	<p>Wairarapa Federated Farmers S193.199</p> <p>Considers the mapping methodology is not fit for purpose. Requests deletion of the map.</p>	Support in part	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S193.199</p>
	<p>Kainga Ora S257.076</p> <p>Supports the identification of land but considers the maps are not readily able to be understood at a site-based level. Considers a definition (rather than mapping) is more appropriate to capture these areas of land. Requests deletion of the map and replacement with a definition to more accurately identify sites.</p>	Support in part	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Allow S257.076</p>
	<p>Forest & Bird S261.271</p> <p>Supports and requests retention as notified.</p>	Oppose	<p>Meridian is concerned about the accuracy and relevance of the map for its existing Mill Creek wind farm;</p> <p>Decision requested: Disallow S261.271 and delete the map.</p>