

In the Environment Court of New Zealand  
Wellington Registry

I te Kōti Taiao o Aotearoa  
Ki te Whanganui-a-Tara

**ENV-2024-WLG-000055**

Under cl 14 of Schedule 1 to the Resource Management Act 1991  
("RMA")

In the matter of an appeal against parts of a decision of the Greater Wellington  
Regional Council on Change 1 and Variation 1 to the  
Wellington Regional Policy Statement

Between **Wellington International Airport Limited**

Appellant

And **Greater Wellington Regional Council**

Respondent

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**Notice of Meridian Energy Limited's wish to be party to proceedings pursuant to  
section 274 of the RMA**

9 December 2024

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**Section 274 party's solicitors:**

Michael Garbett | Rebecca Kindiak

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**anderson  
lloyd.**

**To the Registrar**

**Environment Court**

**Wellington**

- 1 Meridian Energy Limited gives notice it wishes to be party to the following proceedings:

*Wellington International Airport Limited v Greater Wellington Regional Council* (ENV-2024-WLG-000055) being an appeal under clause 14 of Schedule 1 of the Resource Management Act 1991 (**RMA**), against parts of the decision of the Greater Wellington Regional Council (**GWRC**) on Change 1 and Variation 1 to the Wellington Regional Policy Statement (**RPS**).

- 2 Meridian Energy Limited:
  - (a) made a submission and a further submission about the subject matter of the proceedings; and
  - (b) is a person with an interest in the proceedings which is greater than the general public, being a Crown majority-owned publicly listed company undertaking renewable electricity generation activities, and with a special interest in implementing national direction under the National Policy Statement for Renewable Electricity Generation (**NPS-REG**).
- 3 Meridian Energy Limited is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
- 4 Meridian Energy Limited is interested in those parts of the proceeding identified in Attachment 1, concerning the issues identified in Attachment 1, and seeks the relief in Attachment 1 and any ancillary relief to that identified in Attachment 1.
- 5 Meridian Energy Limited agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated this 9th day of December 2024

*m. garbett.*

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Michael Garbett/Rebecca Kindiak  
Counsel for Meridian Energy Limited

This document is filed by Michael Garbett, solicitor for the Section 274 party, of the firm Anderson Lloyd.

The address for service of the Section 274 party is  
Level 12, Otago House, 477 Moray Place, Dunedin 9016.

Documents for service on the filing party may be left at that address for service or may be:

- (a) posted to the solicitor at Private Bag 1959, Dunedin 9054; or
- (b) left for the solicitor at a document exchange for direction to DX Box YX10107 Dunedin; or
- (c) transmitted to the solicitor by fax to + 64 3 477 3184; or
- (d) emailed to michael.garbett@al.nz and ellie.taffs@meridianenergy.co.nz.

**Advice**

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.

**Attachment 1: Specific provisions of Wellington International Airport Limited's appeal in which Meridian has an interest**

Provision in which Meridian has a s274 interest	Relief sought by the Appellant	Meridian supports or opposes the appellant's relief sought	Reason for Meridian's support or opposition
Objective 16	<p>Amend Objective 16 as follows:</p> <p>Indigenous ecosystems and habitats with significant indigenous biodiversity values, other significant habitats of ingenuous fauna, and the ecosystem processes that support these ecosystems and habitats are maintained, protected <del>and where appropriate</del> enhanced <del>and or</del> restored <u>as appropriate and in accordance with an effects management hierarch in order to achieve an overall</u> to a healthy functioning state.</p> <p>Or otherwise delete</p>	Opposes	<p>Meridian made submissions on Objective 16, including a submission point that resulted in the 'and, where appropriate' wording. The appellant's requested amendment contradicts what Meridian had addressed through its submission.</p> <p>Meridian also considers that the overarching objective should not reference the effects management hierarchy as this creates an expectation that all activities (including REG) are subject to that hierarchy.</p>
Policy 24C	<p>Amend the explanation to Policy 24C as follows:</p> <p>Explanation:</p> <p>Policy 24C is to be read together with:</p> <ul style="list-style-type: none"> <li>• Policy 24A which sets out principles for biodiversity offsetting and biodiversity compensation which apply in the coastal environment.</li> </ul>	Neither supports of opposes	The implications of the relief sought on Meridian's interests are unclear.

	<ul style="list-style-type: none"> <li>• Policy 24B in relation to the coastal environment above mean high water springs, with Policy 24C to prevail where there is conflict that cannot be resolved.</li> </ul> <p><del>• Policy 24CC which relates to existing regionally significant infrastructure and REG activities in the coastal environment.</del></p> <ul style="list-style-type: none"> <li>• Policy 24D which applies to REG activities in terrestrial, freshwater and coastal environments.</li> </ul> <p>Otherwise amend Policies 24, 24A, 24B, 24C, and 24CC to simplify the provisions and provide an appropriate consenting pathway for the operation, maintenance, upgrade and extension of existing RSI where adverse effects referred to in Policy 24C (1) and (2) may arise.</p>		
Policy 24CC	<p>Amend the explanation to Policy 24CC as follows:</p> <p>Explanation:</p> <p>Policy 24CC <del>is to be read with Policy 24 and</del> is intended to enable the consideration of the operation, maintenance, upgrade and extension of existing regionally significant infrastructure and existing REG activities with adverse effects that would otherwise need to be avoided under clause (1) and (2) of Policy 24C. It only allows for consideration of these adverse effects when certain requirements are met, including demonstrating that there are no practicable alternative locations for the activity and the activity provides for</p>		<p>The requested amendment impacts REG and regionally significant infrastructure (RSI) and changes the structure of the suite of policies 24 – 24D. Meridian's interest is in ensuring that the bespoke provisions for REG are preserved.</p>

	<p>maintenance, enhancement or restoration of significant indigenous biodiversity values at the area affected.</p> <p><b>For the avoidance of doubt, policies, rules and methods that consider providing for the operation, maintenance, upgrade and extension of existing regionally significant infrastructure and REG activities may include consideration of biodiversity offsetting and biodiversity compensation.</b></p> <p>Otherwise amend Policies 24, 24A, 24B, 24C, and 24CC to simplify the provisions and provide an appropriate consenting pathway for the operation, maintenance, upgrade and extension of existing RSI where adverse effects referred to in Policy 24C (1) and (2) may arise.</p>		
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