

Under the Resource Management Act 1991

In the matter of An appeal under clause 14(1) of the First Schedule of the Act in relation to the Proposed Southland Water and Land Plan

Between **Director-General of Conservation**
Appellant

And **Southland Regional Council**
Respondent

Notice of wish to be a party to proceedings on behalf of Meridian Energy Limited

22 June 2018

Counsel:

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NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS
Section 274, Resource Management Act 1991

TO: The Registrar
Environment Court
Christchurch

- 1 Meridian Energy Limited (**Meridian**) wishes to be a party to appeal ENV-2018-CHC-36 filed by the Director-General of Conservation (**Appellant**) against parts of a decision of Southland Regional Council (**Respondent**) on the Proposed Southland Water and Land Plan (**pSWLP**).
- 2 Meridian made submissions and/or further submissions on the subject matter of the proceedings and/or has an interest in the proceedings that is greater than the interest that the general public has, as an operator and owner of renewable electricity generation assets in Southland including the Manapouri hydro-electric generation scheme and White Hill wind farm near Mossburn.
- 3 Meridian is not a trade competitor for the purposes of section 308C or 308CA of the Act.
- 4 The part of the proceeding Meridian is interested in, and Meridian's position in relation to the relief the Appellant seeks is as follows:

Appendix L.5, Table L.4

The Appellant seeks a reinstatement of the notified primary groundwater allocation limit for the Te Anau Groundwater Management Zone of $88.94\text{m}^3 \times 10^6$ /year rather than the decision limit of $118.25\text{m}^3 \times 10^6$ /year.

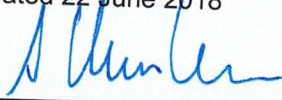
Meridian's position

Meridian conditionally supports the relief sought by the Appellant. Because surface water in the Te Anau Groundwater Management Zone area is fully allocated, available groundwater is limited to that with low hydraulic connection to surface water. Whichever limit is included in Table L.4 (88.94 or $118.25\text{m}^3 \times 10^6$ /year) it significantly exceeds the actual groundwater available for allocation to new activities. Given this, Meridian prefers the lower rather than the higher number.

In addition, Meridian is not aware of the existence of any assessment of the likely effects of nutrient losses to ground and surface water should such a large additional allocation of water be made. The proposed allocation limit is potentially misleading to readers of the pSWLP and creates an inappropriate expectation that additional water is available for land use and development.

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

Dated 22 June 2018



Stephen Christensen
Counsel for Meridian Energy Limited